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# START 3

Superfund Technical Assessment and Response Team 3 -  
Region 8

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United States  
Environmental Protection Agency  
Contract No. EP-W-05-050

## PHASE II ANALYTICAL RESULTS REPORT

**EATON SUGAR BEET FACTORY  
TARGETED BROWNFIELDS ASSESSMENT (TBA)**  
Eaton, Weld County, Colorado

TDD No. 0912-06

October 19, 2010



**URS**

OPERATING SERVICES, INC.

In association with:

Garry Struthers Associates, Inc.  
LT Environmental, Inc.  
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**SUBJECT: START 3, EPA Region 8, Contract No. EP-W-05-050, TDD No. 0912-06  
Phase II Analytical Results Report – Eaton Sugar Beet Factory Targeted  
Brownfields Assessment (TBA) Eaton, Weld County, Colorado**

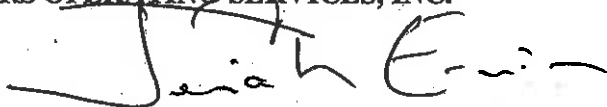
Dear Bill:

Attached is one final copy of the Final Phase II Analytical Results Report (ARR) for the Eaton Sugar Beet Factory TBA, Eaton, Weld County, Colorado. Field sampling events were conducted April 5-9, 2010 and July 12-15, 2010. This document is submitted for your review and approval.

If you have any questions, please call me at 303-291-8272.

Very truly yours,

URS OPERATING SERVICES, INC.



Jeremiah Ervin  
Project Manager

Attachment

cc: Charles W. Baker w/o attachments  
File/UOS

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Project Manager, START 3, EPA Region 8

START 3, EPA Region 8

## PHASE II ANALYTICAL RESULTS REPORT

### EATON SUGAR BEET FACTORY TBA Eaton, Weld County, Colorado

EPA Contract No. EP-W-05-050  
TDD No. 0912-06

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**PHASE II ANALYTICAL RESULTS REPORT  
for  
TARGETED BROWNFIELDS ASSESSMENT**

**EATON SUGAR BEET FACTORY  
Eaton, Weld County, Colorado**

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## 1.0 INTRODUCTION

This document is submitted in accordance with the task elements specified in Technical Direction Document (TDD) 0912-06 dated December 11, 2009, issued to URS Operating Services, Inc. (UOS) Superfund Technical Assessment and Response Team 3 (START) in Region 8 of the U.S. Environmental Protection Agency (EPA). The purpose of this TDD is to perform a Targeted Brownfields Assessment (TBA) at the Eaton Sugar Beet Factory (ESBF) property in Eaton, Weld County, Colorado.

The town of Eaton has requested assistance from the EPA with characterizing environmental conditions for the ESBF property in Eaton, Weld County, Colorado (Figure 1). The town intends to redevelop the property into an industrial business park that is rail-served with a mini-transload facility. The town's goal is to eliminate the public hazard and attract sustainable businesses in existing and emerging industries, which will bring jobs and revenue to the town and the region (UOS 2010a). This Phase II Analytical Results Report (ARR) includes the analytical results for samples collected on the property from April 5 through April 12, 2010 and July 12 through July 16, 2010, field observations noted during fieldwork, and recommendations for cleanup actions.

Field samples of construction material, paint chips, groundwater, and both surface and subsurface soil were collected from the property. Construction material samples were collected from the main building, office building, warehouse, and exterior debris piles along with ten-point composite soil samples collected from 50-foot by 50-foot sample cells gridded out in areas of concern. These samples were analyzed for asbestos-containing material (ACM). Painted areas in the office building were analyzed in-situ and samples were also collected and analyzed for lead-based paint (LBP). Groundwater and soil samples were analyzed for target analyte (TAL) metals, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, and polychlorinated biphenyls (PCBs). Additionally, five samples from the lime waste pile were collected and analyzed for Resource Conservation and Recovery Act (RCRA) Metals, hypothetical calcium compounds, moisture weight percent, and carbon weight percent. Twenty-five containers of unknown material underwent hazardous classification (HazClass) in the field.

### 1.1 PURPOSE

The purpose of this Phase II investigation was to collect sufficient environmental data to address the potential recognized environmental conditions identified in the Phase I Report (UOS 2010a). Specifically, the objectives of this Phase II Environmental Assessment are to:

- Determine if surface soil, subsurface soil, and groundwater at the ESBF property contains metal, VOC, SVOC, pesticide, or PCB levels over acceptable state and federal benchmarks;
- Determine if the office building on the ESBF property contains LBP in excess of 1 milligram per square centimeter ( $\text{mg}/\text{cm}^2$ ) or 5,000 milligrams per kilogram ( $\text{mg}/\text{kg}$ ) (0.5 percent) to determine how building debris must be handled in the event of renovation or demolition;
- Determine if the building structures and soil on the ESBF property contain asbestos at concentrations in excess of 1 percent and provide a preliminary cost estimate for asbestos abatement activities;
- HazClass unknown containers to determine if hazardous chemicals are present at the ESBF property and provide a preliminary cost estimate for hazardous chemical container disposal;
- Evaluate the lime waste pile to see if the lime waste can be used by agricultural companies for land-use applications to increase the pH of agricultural soil;
- Develop sufficient information about the presence of recognized environmental conditions at the property to meet the Brownfields objectives of the town of Eaton, including providing sufficient data to assist the town in making informed decisions concerning the redevelopment of the property into a industrial business park that is rail-served with a mini-transload facility; and
- Prepare a Phase II Report summarizing the results of the investigation of the property, providing cost estimates for abatement of hazardous wastes and ACM and soil, and stating how potential contamination may affect proposed development plans.

Recognized environmental conditions are defined in ASTM International Standard E 1527-05 (ASTM International [ASTM] 2005a) as “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.” The term includes hazardous substances or petroleum products even under conditions in

compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not recognized environmental conditions (ASTM 2005a).

## **1.2 DETAILED SCOPE OF SERVICES**

The scope of this Phase II includes environmental sampling and reporting requirements that support the TBA Grantees' desire to take over ownership of the property and redevelop the property into an industrial business park that is rail-served with a mini-transload facility.

The scope of services follows standards documented in the ASTM Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process with ASTM International designation: E 1903-97 (ASTM 2005b). This scope of services may be modified by EPA as more information regarding property conditions becomes available.

## **2.0 BACKGROUND**

### **2.1 LOCATION AND LEGAL DESCRIPTION**

The ESBF property is located in Eaton, Weld County, Colorado (Figure 1). The ESBF property covers approximately 43.11 acres and is bordered by residential housing, commercial real estate, and industrial businesses (UOS 2010a). The ESBF property is located on the east side of US Highway 85, northeast of East Collins Street/Weld CR 74 (Figure 2). The legal description of the property is the southeast quarter of the southwest quarter of Section 31, T.7 N., R. 65 W. (U.S. Geological Survey [USGS] 1975). The geographic coordinates of the property are 40° 31' 36.423" north latitude and 104° 42' 4.73" west longitude (USGS 1975).

### **2.2 PROPERTY AND VICINITY GENERAL CHARACTERISTICS**

The ESBF property site features as of the date of this report included two dilapidated houses; a four-story building (former Great Western Sugar [GWS] factory main building), which is connected to the old boiler house, machine shop, and lime house; a large brick building (former GWS warehouse); another old brick building (former GWS office); and a lime pile where lime was disposed of after being used in the purification process of making sugar.

## **2.3 HISTORICAL USE INFORMATION ON THE PROPERTY**

The ESBF property was vacant until 1902 when the Kilby Manufacturing Company of Cleveland, Ohio built the GWS factory, which was the first sugar beet factory in Weld County. Agriculture was the primary industry in surrounding areas and the town of Eaton, and the GWS factory enabled the town and the surrounding areas to develop their agricultural industries to their fullest capability. Within 2 years of the GWS factory's construction, the town nearly doubled in population. The potato crop had long been the most important agricultural crop in Weld County, but price fluctuations in the early 1900s yielded uncertain returns to farmers. The sugar beet crop, which had a fixed price per ton, somewhat relieved this uncertainty (UOS 2010a).

Floyd Foster, superintendant of GWS factory from 1960 to 1970, remembers vividly the workings and operations of the GWS factory during the time period he worked there. Mr. Foster explained that there were three process water groundwater wells, and water was used during the basic steps in processing sugar beets into beet sugar. The process water was then was pumped out to a recirculating pond and surge pond on the east side on the GWS factory main building to be treated and then recycled. Mr. Foster explained that limestone would be brought to the property and the lime would be extracted with coke into a coke lime slurry and used in the purification process. The lime would then be dried from the slurry and placed in piles on the northeast section of the ESBF property. Mr. Foster also remembered that piping insulation for the main GWS factory building was made at the facility. Asbestos sheets would be brought to the GWS factory and workers would use a hammer mill to break up the asbestos and make a putty mixture with the broken pieces of asbestos and combine that with cheese cloth to make insulation for piping in the building. Mr. Foster explained that the hammer mill was torn out in 1968, and in approximately the same year, fiberglass insulation was used on a more regular basis (UOS 2010a).

## **2.4 HISTORICAL USE INFORMATION ON ADJOINING PROPERTIES**

Eaton, Colorado was founded in 1892 and was a farming and ranching community. The town is named after Benjamin Harrison Eaton, a pioneer of irrigation who played a leading role in the late 1800s in transforming the arid prairie of the Great Plains east of Colorado's Front Range into a thriving agricultural region with water brought from the nearby Rocky Mountains. Much of the farming and ranching country around Eaton, Colorado continues to depend to this day on the irrigation systems engineered by Eaton and others (UOS 2010a).

Six fire insurance maps were found dating from 1904 to 1946 for the ESBF property. The fire insurance maps show a lumber yard present on the east side of the ESBF property from 1904 to 1946. Most of the land surrounding the GWS factory appeared to be undeveloped agricultural land during the 1904 to 1946 time period (UOS 2010a).

## **2.5 CURRENT USE OF THE PROPERTY AND ADJOINING PROPERTIES**

The ESBF property is currently abandoned and is not being used for any commercial purpose (Figure 2). Graffiti, evidence of vandalism, and salvaging of both the inside and outside of the main structures on the property are evident (UOS 2010a). Apparently local youth use the lime pile on the northeast section of the property for biking trails, as evidenced by the eroded tracks on the pile. The town of Eaton assumes that local kids use the structures on the property for exploring because no barriers are in place to stop access into the structures on the property (UOS 2010a).

## **2.6 PHYSICAL SETTING OF THE PROPERTY**

### **2.6.1 Topographic Characteristics**

The ESBF property is located in the South Platte River basin of Northern Colorado. The topography is generally flat, and the surrounding land usage is generally irrigated crop and grazing land. The ESBF property is located on the southeast edge of the town of Eaton at an elevation of 4,826 feet above mean sea level (UOS 2010a). The climate in the Eaton, Colorado area is semiarid. The mean annual precipitation as totaled from the University of Delaware database is 14 inches. The net annual precipitation as calculated from precipitation and evapotranspiration data obtained from the database is 1.61 inches (University of Delaware 1986). The 2-year, 24-hour rainfall event for the property area is approximately 1.5 inches (Dunne and Leopold 1978).

### **2.6.2 Geology**

The ESBF property lies in the plains of Eastern Colorado. Quaternary eolium and alluvium overlay Cretaceous interbedded marine deposits. The Cretaceous Laramie and Fox Hills Formation consist of sandstone and shale deltaic marine deposits. The deposits are approximately 300 feet thick in eastern Colorado, and some bedrock outcrops are visible northwest of Eaton (Colorado Geological Survey 1998).



Light brown to gray deposits of loess, windblown clay, silt, and sand blanket much of the eastern Colorado plains with deposits ranging in thickness from 3 to 15 feet (Colton 1978). Sandy alluvium is also present in various thicknesses in the area near streams and creeks, but also as paleochannels under the loess deposits (Topper et al. 2003). The alluvium is 20 to 60 feet thick in areas (Topper et al. 2003). Topsoil in the area is generally a silty to sandy loam with moderate water infiltration rates (UOS 2010a).

No major structural features are described or identified on any geologic maps (Colton 1978).

### **2.6.3 Hydrogeology**

The ESBF property is located in the lower portion of the South Platte River basin (Topper et al. 2003). The South Platte River basin aquifer is an unconfined aquifer in the Quaternary alluvial and upper Cretaceous sandstone deposits. The Cretaceous aquifer is little utilized as a viable aquifer north of Greeley (Topper et al. 2003). The thickness of the alluvium and the alluvial aquifer varies across the basin, but the alluvial aquifer thickness is 20 to 60 feet thick in the Eaton area (Topper et al. 2003). Groundwater flow is generally down-valley to the south-southeast towards the Poudre River valley near Greeley. Groundwater wells in a 1-mile radius of the property are generally 60 to 90 feet deep and report groundwater at 20 to 30 feet below ground surface (bgs) (UOS 2010a).

The Dakota-Cheyenne aquifer is a deeper aquifer below the confining shale layers of the Upper Cretaceous. The depth to the groundwater varies but well depths that utilize the aquifer in the Greeley area are reported to be 100 to 200 feet in depth (Topper et al. 2003).

Finer grained material and poorly sorted sediments can create locally perched or confined aquifers (Topper et al. 2003). Local groundwater surface elevations will be influenced by current surface water elevations and local water usage. Groundwater levels were recorded where attainable during field operations and are presented below.

**Table A**  
**Groundwater Levels for UOS Direct Push Wells April 2010**

Wells	Sample ID	Water Level (ft bgs)	Soil Sample Depth (ft)
EFGW01	EFGW01	30.7	18
EFGW02	EFGW02	30.3	18
EFGW03	EFGW03	20.3	18
EFGW04	Refusal/Dry Hole	N/A	18
EFGW05	Refusal/Dry Hole	N/A	18
EFGW06	EFGW06	32.1	18
EFGW07	EFGW07	36.7	18
EFGW08	EFGW08	31.1	18

bgs      below ground surface  
 ft              feet  
 N/A      not applicable

#### 2.6.4 Hydrology

The ESBF property is generally flat with surface water drainage via overland flow expected to be to the south-southeast. Surface water flows into the Eaton Draw (Irrigation Ditch, east of the property) which flows towards the Poudre River valley (Colton 1998). A threat of flooding does not pertain to the ESBF property (Federal Emergency Management Agency [FEMA] 2009).

### 3.0 PROJECT DATA QUALITY OBJECTIVES

The EPA Data Quality Objectives (DQO) process is a seven-step systematic planning approach to develop acceptance or performance criteria for EPA-funded projects. The seven steps of the DQO process are:

- Step 1 The Problem Statement;
- Step 2 Identifying the Decision;
- Step 3 Identifying the Decision Inputs;
- Step 4 Defining the Study Boundaries;
- Step 5 Developing a Decision Rule;
- Step 6 Defining Tolerance Limits on Decision Errors; and
- Step 7 Optimizing the Sample Design.

These DQOs were developed by UOS based on information provided by the EPA, Town of Eaton, and research to compile the Phase I report on this property. A complete step-by-step explanation of the DQO process for this property is provided in the approved Field Sampling Plan (FSP) (UOS 2010b).

The five questions identified in the DQO process to be answered by this investigation were:

1. How contaminated is the property with ACM and LBP?
2. Has the property been contaminated by hazardous chemicals stored on the property or by the two leaking underground storage tanks upgradient from the property?
3. If contamination is detected, is the contamination at levels or quantities that would preclude redeveloping the property?
4. What are remediation options and estimated costs for asbestos and LBP abatement?
5. What are disposal options and estimated costs for hazardous waste on the property?

### **3.1 DEVIATIONS FROM THE WORK PLANS**

Deviations from the approved FSP were made based on field observations. They include the following:

1. The original plan called for subsurface soil samples to be collected by boring stainless steel hand augers to a depth of 18". Instead a truck-mounted direct-push drill rig was used to collect subsurface soil samples.
2. Six of the proposed eight temporary groundwater wells were sampled. Temporary wells that were not sampled were abandoned due to contact with bedrock and/or refusal during borehole advancement.
3. Groundwater samples were collected using a inertia pump because groundwater well 0.5" casings were too small to use a Teflon bailer or bladder pump.
4. Asbestos inspection observations and sampling activities were logged into a data dictionary using a Nomad Trimble, rather than using surface soil asbestos sampling data sheets and asbestos-contaminated soil inspection forms.

#### **4.0 SAMPLING ACTIVITIES AND LOCATIONS**

##### **4.1 SOIL SAMPLING**

Twenty surface soil samples (0 to 6 inches) and eight subsurface soil samples (6 to 18 inches) were collected from 28 sample locations at the ESBF property (Table 1). The 20 surface soil samples were collected in places where visible staining, distressed vegetation, and other types of disturbances were visible. The eight subsurface soil samples were collected in locations that were co-located with proposed groundwater sampling locations.

A disposable scoop or, for SVOCs or pesticides, a decontaminated metal scoop was used to collect the surface soil samples from a depth of 0 to 6 inches. Surface soil samples were collected into 8-inch by 8-inch (polyethylene) clear plastic bags and prescreened for VOCs. After sample collection, the sample identifier, date, and time of sample collection was written on the sample container with waterproof ink. Samples then were placed into their appropriate sample containers.

Subsurface soil samples were collected at the site using a truck-mounted direct-push drill rig. A 2-inch outside diameter core barrel fitted with a disposable acetate soil-core collection sleeve was advanced with the drill rig to a depth of 18 inches. Soils extracted from soil core sleeves were collected for analysis.

All samples were labeled, packed in coolers with ice preservative, and shipped to a Contract Laboratory Program (CLP) laboratory following chain-of-custody (COC) procedures.

All soil sample locations were recorded using a global positioning system (GPS) unit to ensure accurate sample locations for this report. Photographs are included in Appendix A, and sample locations are shown in Figure 3. Laboratory analytical results are included in Appendix B.

##### **4.2 LIME WASTE PILE SAMPLING**

Five lime waste samples were collected from the lime waste pile that makes up the northeast corner of the ESBF property. Lime waste samples were collected using disposable scoops, placed into appropriate labeled containers, and sent following COC procedures to Wyoming Analytical Laboratories, Inc.

All lime waste pile sample locations were recorded using a GPS unit to ensure accurate sample locations for this report. Photographs are included in Appendix A and sample locations are shown in Figure 7. Laboratory analytical results appear in Appendix B.

#### **4.3 MONITORING WELL GROUNDWATER SAMPLING**

Six temporary wells were successfully installed, and groundwater grab samples were collected at the ESBF property. A truck-mounted direct-push Geoprobe® rig advanced a 2-inch core barrel to a depth that was approximately 5 feet deeper than the observed groundwater depth and/or to a refusal depth. Half-inch well casings, with 5 to 10 feet of well screen, were placed to depth with 5 feet of sand pack. Soil cores were collected at EFGW01 and EFGW02 into a 2-inch acetate core barrel sleeve during borehole advancement, thus allowing for extraction of a lithologic core for logging, interpretation, and sample collection.

The following locations were advanced until met with refusal by the drill rig:

- EFGW04
- EFGW05

These locations were refused prior to contact with any groundwater; therefore, holes were backfilled and abandoned using bentonite clay.

Groundwater samples were collected using a disposable inertia pump. Groundwater was purged of at least three well volumes or until the parameters of temperature, pH, and conductivity were stabilized within 10 percent of their relative values (UOS 2010a). All samples were labeled, preserved appropriately, packed in coolers, and shipped to a CLP laboratory following COC procedures.

All groundwater sample locations were recorded using a GPS unit to ensure accurate sample locations for this report. Photographs are included in Appendix A and sample locations are shown in Figure 5. Laboratory analytical results are included in Appendix B.

#### **4.4 HAZARD CLASSIFICATION SAMPLING**

A total of 59 containers were found on the ESBF property that contained some type of contents (Figure 8). To determine the hazardous waste characteristics of these containers, twenty-five

containers were HazClassed. START discovered two factory-sealed containers, which were not HazClassed. HazClass activities began the first day of field activities with an exclusion area being designated and each unknown container documented, photo documented, and assigned a unique sample identifier. All containers were marked with either a blue letter “F” with a circle around the letter, meaning the container had material, or with an orange letter “X” meaning the container was empty. Each container was organized according to appearance.

After all organization and initial documentation was completed, each container was sampled by a qualified START member dressed in Level B personal protective equipment (PPE), with another START member as backup for emergency purposes and for sample transport. All samples were collected using a disposable drum thief or disposable scoop and placed into certified pre-cleaned 8-ounce glass jars. The samples were taken to an area located outside the exclusion area and then HazClassed by a START chemist. The START chemist assigned a hazardous waste characteristic to all samples, according to the RCRA (40 CFR, Part 261.20) definitions of ignitability, corrosivity, and reactivity based upon the HazClass results and designated a U.S. Department of Transportation hazard class waste stream (49 CFR Parts 171, 172).

#### **4.5 ASBESTOS CHARACTERIZATION OF BUILDING STRUCTURES**

Asbestos characterization samples were collected the week of April 5, 2010 by START personnel who are Colorado-certified asbestos building inspectors.

START personnel performing sampling wore PPE appropriate to the hazard presented at the time. At a minimum, the following guidelines were followed: When disturbing friable material, when in an isolated area that is contaminated with friable asbestos, or in a sampling situation that will generate significant quantities of dust, gloves and high-efficiency particulate air (HEPA) respiratory protection were worn. Sampling of non-friable materials did not require PPE, provided that dust was not generated in the process.

Asbestos bulk samples were collected in a random and representative manner based on the EPA publication “Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials” (EPA 1985). One-hundred and eighty suspect ACM samples were collected during the inspections of the structures on the ESBF property.

## **4.6 ASBESTOS-CONTAMINATED SOIL DELINEATION**

Asbestos-contaminated soil (ACS) delineation was completed July 12 through July 15, 2010. The soil delineation occurred in two steps, first with a visual inspection, and second with collection of samples. START personnel performing the inspections and collections of samples wore appropriate PPE relative to site hazards and followed the health and safety plan developed for the ESBF property. All inspections and collection of samples were performed by START personnel with Colorado certification for asbestos building inspection who had a minimum of six months experience with ACS.

### **4.6.1 Asbestos-Contaminated Soil Inspections**

ACS inspections were conducted by a single inspector who made a minimum of 10 passes in two perpendicular directions (20 passes per cell) for each 50-foot grid cell. Inspectors conducted detailed examinations of the ground surface. For each grid cell that was inspected, a data dictionary form was filled out on a Trimble Nomad GPS unit detailing sample identification, sample date, whether a sample was collected, who collected the sample, soil type, sum of ACM and friable ACM in the cell, whether there was ACM or friable ACM present in the cell, the grid cells disposition, and descriptions of ACM and non-ACM present in each inspected grid cell (Figure 4).

Where feasible, START inspectors picked up by hand pieces of suspect ACM (defined as less than approximately 25 separate pieces of suspect ACM, where multiple pieces in a single location less than 1 square foot [sq ft] count as one). START inspectors did not remove suspect ACM in quantities that, when combined for this project, exceeded trigger levels of 260 linear feet (ln. ft, 160 sq ft, or a 55-gallon drum (Colorado Department of Public Health and Environment [CDPHE] 2007, 2008). START inspectors removed suspect ACM from the grid squares that were the least contaminated first, and then cleared more grid squares without exceeding trigger levels. The procedures for hand-picking suspect ACM included the following:

Amended water (surfactant consisting of 1 ounce of a solution of 50 percent polyethylene ester and 50 percent polyethylene ether mixed with five gallons of water) was applied to adequately wet the material and surrounding soil within and outside each sampling grid.

Suspect non-friable ACM was picked up and placed into 6-mil bags. Friable ACM and 2 inches of surrounding and underlying soil were collected and placed into 6-mil bags (CDPHE 2008).

Waste bags were double-bagged, sealed, labeled, and staged inside the waste management roll-off container already containing bagged ACM inside the ESBF main factory building.

Inspectors conducted follow-up visual inspection of the grid cell until no more visible suspect ACM was found. Each subsequent inspection was conducted in a direction perpendicular to the previous pass. START Project Manager Jeremiah Ervin and the Colorado-certified asbestos building inspectors determined that two to three inspections were adequate for cells inspected.

If clearance of the grid cell was not feasible by picking up pieces of suspect ACM by hand, START inspectors documented the areas and collected a grab sample of the suspect ACM. Figure 4 shows sample results for these grid cells. Some grid cells contained suspect ACM in debris piles spread over significant areas, and START designated these grid cells as containing suspect ACM and collected grab samples of the suspect ACM for confirmation. Geographic coordinates were collected for each grid cell that was visually inspected (Table 16).

#### **4.6.2 Asbestos-Containing Surface Soil Sampling**

After an ACS inspection was completed for a grid cell, the appropriate grab or ten-point composite final clearance surface soil sample was collected. Ten-point composite surface soil samples were collected using disposable scoops and placed into 8-inch by 8-inch clear plastic (polyethylene) bags. After sample collection, the sample identifier, date, sampler, and time were written on the sample container with waterproof ink.

Aliquot locations were representative of the entire grid cell, and aliquots were collected where any visible friable suspect ACM was found (UOS 2010a). Sampling personnel completed an asbestos surface soil sample data dictionary entry into a Trimble Nomad GPS unit for each sample (Table 14).



All samples were packaged in accordance with UOS TSOP 4.4, "Sample Identification, Labeling, and Packaging" (UOS 2005). All samples were handled in strict accordance with the COC protocol specified in UOS TSOP 4.3, "Chain of Custody" (UOS 2005), and were delivered to Reservoirs Environmental, Inc. All sample locations were identified by GPS and/or plotted on a map of the sample area. Sample locations were also photographed as appropriate. All non-dedicated sampling equipment was decontaminated before collection of each sample in accordance with START TSOP 4.11, "Equipment Decontamination" (UOS 2005). Sample locations and rationale are listed in Table 1.

#### **4.7 LEAD-BASED PAINT SURVEY OF THE OFFICE**

This Phase II investigation involved the collection of 30 XRF readings for lead using a handheld XRF instrument to analyze painted and coated exterior and interior surfaces of the office building on the ESBF property (Figure 6). These readings included one reading of the paint of each wall, one reading of the paint of the ceiling (when accessible), and as many as four other painted surfaces in each room equivalent or building exterior. One of each of the following building elements was examined in each room or building exterior, if present:

- Window casings, stops, jambs, and aprons;
- Interior window mullions and window sashes;
- Door jambs, stops, transoms, casings, and other door frame parts;
- Door stiles, rails, panels, mullions, and other door parts;
- Baseboards and associated trim (such as quarter-round or other caps); and
- Built-in or attached furniture such as bookcases, shelving, and chalk trays.

Additionally, 13 paint chip samples were collected and hand-delivered to Reservoirs Environmental, Inc. in Denver, Colorado on May 8, 2010 for confirmatory analysis.

#### **5.0 ANALYTICAL RESULTS**

Analytical results are presented in Tables 2 through 9 and Tables 13 through 15. The EPA Regional Screening Levels (RSLs) for industrial soils and the State of Colorado Drinking Water Maximum Contaminant Levels (MCLs) are used in Tables 2 through 6. All groundwater samples were analyzed for Total Metals. Although groundwater isn't currently being used and hasn't historically been used as a

drinking water source on the ESBF property, total metals analysis is used as a worst case scenario. MCL standards are based on dissolved metal concentrations. If the groundwater on the ESBF property is ever to be used as a drinking water source, re-sampling for dissolved metals analysis will need to occur. The EPA RSL industrial soil standard was selected over the residential standard because the ESBF property's proposed future redevelopment is an industrial business park that will be rail-served with a mini-transload facility.

The analytical methods used for the laboratory analyses are as follows:

- Lead in Paint – EPA Method 7420;
- Asbestos – Polarized Light Microscopy (PLM);
- VOCs – CLP Method SOM01.2
- SVOCs – CLP Method SOM01.2
- Metals – CLP Method ILM05.4
- Pesticides – CLP Method SOM01.2
- PCBs – CLP Method SOM01.2

## 5.1 SOIL SAMPLES

Twenty-eight soil samples were collected from the ESBF property, including 20 surface soil samples (0 to 6 inches) and 8 subsurface soil samples (6 to 18 inches). A number of the soil samples analyzed had detections for VOCs, pesticides, and/or PCBs, but the concentrations were below the EPA RSL for industrial soils (Tables 2 and 3). Because the results for VOCs, pesticides, and/or PCBs were below the EPA RSL, the significance of these detections to redevelopment of the ESBF property for industrial use may be limited.

Five soil samples, one subsurface and four surface, had detections of SVOCs above the EPA RSLs, which are risk-based concentrations. Benzo(a)pyrene was detected in concentrations above the EPA RSL in soil samples EFSO0010, EFSO0016, EFSO0017, EFSO0020, and EFSO1807. Benzo(a)anthracene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, and ideno(1,2,3-cd)pyrene were detected in soil sample EFSO0016 above the EPA RSLs (Table 2)(Figure3).

TAL metal analysis on each of the 28 soil samples revealed arsenic concentrations above the EPA RSL (Table 4). The ubiquitous nature of arsenic suggests their values are consistent with values for arsenic in the soil for the northeastern Colorado area and are not indicative of contamination at the site (Shacklette and Boerngen 1984). The lead concentration in sample EFSO0004 (1,350 ppm) exceeded the EPA RSL of 800 ppm. Several other metals were detected in the soil samples at concentrations below the EPA RSLs (Table 4).

## **5.2 SOIL OPPORTUNITY SAMPLES**

Twelve surface soil grab samples were collected from biased locations during the first field sampling event (April 5 through April 12, 2010) for PLM asbestos analysis. These opportunity samples were collected to provide information regarding whether asbestos had migrated out from any of the buildings on the property. Nine of the 12 samples analyzed for ACM came back positive for containing asbestos. Further asbestos assessment of the soils on the ESBF property took place during the second sampling event (July 12 through July 15, 2010), and these results are discussed in Section 5.7 of this report.

## **5.3 LIME WASTE PILE SAMPLES**

Five lime waste samples were collected from the surface of the lime waste pile that makes up the northeast area of the ESBF property. These samples were collected and analyzed for the Colorado Brownfields Foundation, which was looking into the potential of using the lime waste pile in agriculture to change soil alkalinity in crop land. Analytical results for the five lime waste samples showed high percentages of calcium carbonate, ranging from 82 to 83 percent of each sample. The Colorado State University Soil, Water and Plant Testing laboratory advised that limestone with this high a percentage of calcium carbonate would be ideal for changing pH in highly acidic soils (CSUSWPTL 2010) (Table 15) (Figure 7).

## **5.4 GROUNDWATER SAMPLES**

Six groundwater samples were collected from the ESBF property. None of the water samples analyzed were above the MCL for VOCs, SVOCs, or pesticides.

All six groundwater samples contained concentrations of lead, ranging from 25.9 to 119 parts per billion (ppb), which are above the MCL for drinking water. Five of the groundwater samples contained concentrations of arsenic, ranging from 10 to 25.9 ppb, which are above the MCL for

drinking water. The beryllium concentration for three of the water samples were above the MCL for drinking water, ranging from 4.1 to 4.6 ppb (Figure 5).

## 5.5 HAZARD CLASSIFICATION

A total of 25 HazClass samples were collected, representing the contents of 59 containers (Figure 4). Containers that appeared to have the same contents based on material appearance, container appearance, or container label were grouped together and one sample was collected to represent the grouping. HazClass samples were not collected from the two factory sealed drums discovered on the property. The HazClass testing allowed a START chemist to assign a hazardous waste characteristic to each container, according to the RCRA (40 CFR, Part 261.20) definitions of ignitability, corrosivity, and reactivity. Based upon the HazClass results, START designated a U.S. Department of Transportation hazard class waste stream to each sample (49 CFR Parts 171, 172).

Hazard Classification completed on the 25 samples identified the following:

- Eleven samples (EBHZ01-04, 06, 10, 11, 14, 19, 24, and 25), representing 11 containers, were identified as “not reactive,” which must be considered toxic until determined non-toxic by laboratory analysis.
- One sample (EBHZ05), representing one container, was identified as a chlorinated solvent.
- Two samples (EBHZ07 and 08), representing two containers, were identified as a corrosive solvent.
- Ten samples (EBHZ09, 12, 13, 16-18, and 20-23), representing 41 containers, were identified as flammable or combustible substances.
- One sample (EBHZ15), representing two containers, was identified as an oxidizer.

The results of the HazClass sampling and analysis, including container volumes, are presented in Table 9.

## 5.6 ASBESTOS CHARACTERIZATION OF BUILDING STRUCTURES

A total of 180 building material samples were collected for PLM asbestos analysis, including up to seven samples of each suspect material. ACM is identified as material containing greater than 1

percent asbestos (40 CFR 763). The laboratory identified asbestos at concentrations greater than 1 percent in 69 of the building material samples collected. The materials identified as asbestos-containing were quantified and identified into the appropriate category below.

- Boiler Insulation – 8,718 sq ft
- Cementeous Flat – 1,800 sq ft
- Friable Bulk Debris – 80,275 sq ft
- Duct Insulation – 4,500 sq ft
- Irregular Surface – 18 sq ft
- Millboard – 900 sq ft
- Pipe Insulation – 2,823 ln ft
- Shingle Roofing – 26,948 sq ft
- Transite Siding – 5,985 sq ft
- Vinyl Floor Tile – 6,202 sq ft

The laboratory report for the initial PLM asbestos analysis is included in Appendix B. The sample types and results are presented in Table 13.

## **5.7 ASBESTOS-CONTAMINATED SOIL DELINEATION**

A total of 171 ten-point composite surface soil samples and 76 suspect ACM bulk grab samples were collected for PLM asbestos analysis at Reservoirs Environmental, Inc. Thirty bulk grab samples had asbestos concentrations of greater than 1 percent, and four soil samples had results of trace. Anywhere a positive detection for asbestos was identified, the entire sample cell was identified as containing asbestos.

Asbestos soil samples were not collected in some sample cells because identified facility components or uniform debris piles were encountered in multiple cells in the same area. In this case, the suspect ACM debris in one of the cells was sampled and the surrounding cells were visually inspected to confirm the presence of similar ACM. This process pertains to the area inside the fence around the main building and the large debris field at the center part of the north

side of the ESBF property. An area of 220,112 sq ft of delineated ACM/ACS was identified at the ESBF property (Figure 4).

## **5.8 LEAD-BASED PAINT SURVEY OF THE OFFICE**

Thirty paint samples were analyzed *in situ* using an Innov-X Systems A-4000 handheld XRF instrument. LBP is defined as paint with a lead concentration greater than or equal to 1 mg/cm<sup>2</sup> or 0.5 percent (5,000 mg/kg) (U.S. Department of Housing and Urban Development [HUD] 2005). Of the 30 *in situ* samples analyzed, 4 samples were identified as containing LBP. The four positive samples were collected from the interior of the office building including two walls in the entryway, a section of painted floor on the second floor, and a window casing on the second floor (Figure 6).

LBP testing data sheets are included in Appendix D. LBP was not identified on exterior surfaces; therefore, no soil samples for lead analysis were collected from the area surrounding the office building.

Paint chip samples were collected from the office building for quality control. A 4-inch square (in<sup>2</sup>) (or 25 centimeter square [cm<sup>2</sup>]) area of paint was collected into seal-top poly bags. Paint chip samples included all layers of paint down to the substrate material. Thirteen paint chip samples were collected for the ESBF property.

The laboratory results for the paint chip samples are listed in Table 8. The laboratory results are reported in mg/kg, which cannot be directly related to the XRF results in mg/cm<sup>2</sup>.

## **6.0 DATA QUALITY ASSESSMENT**

### **6.1 FIELD DATA QUALITY ASSESSMENT**

All applicable TSOPs were followed as prescribed in the approved FSP (UOS 2005, UOS 2010b).

All appropriate documentation including the logbook, photo documentation, sample locations, sample handling, and COC procedures were followed in the field. All field tools were decontaminated according to the applicable TSOPs. All of the samples were extracted and analyzed according to their respective analyses.

## 6.2 DATA QUALITY INDICATORS

A START chemist reviewed the project data to determine data quality and usability (Appendix B). Additionally, a UOS chemist reviewed all analytical data. The project data quality review included:

- Quality assurance/quality control (QA/QC) review of field-generated data and observations;
- Evaluation of QC samples including equipment rinsates, field replicates, and matrix spike laboratory control samples to assess the quality of the field activities and laboratory procedures;
- Assessment of the quality of data measured and generated in terms of accuracy, precision, and representativeness; and
- Summary of the usability of the data, based upon the assessment of data conducted during the previous steps.

### 6.2.1 Bias

Bias is systematic or persistent distortion of a measurement process that causes errors in one direction. The extent of bias was determined by an evaluation of trip/method/holding blanks, laboratory initial calibration/continuing calibration verification, laboratory control spike/laboratory control spike duplicates (LCS/LCSD), blank spikes, matrix spike/matrix spike duplicate (MS/MSD), and duplicates for metals

The trip blanks and three groundwater samples contained acetone in roughly equivalent concentration. These acetone detections should be discounted as cross-contamination. The acetone contamination may have biased the acetone concentration to be high in samples EFGW01, EFGW02, and EFGW03. Cross-contamination of the samples occurred in the laboratory. The data remain useable.

Method blanks for VOC analysis for water and soil and SVOC analysis for soil showed detections for siloxane compounds (non-targeted tentatively identified compounds) at similar concentrations as the samples. The siloxane compounds detected in the samples should be discounted because they are due to GC column breakdown. The data remain usable.

Holding blanks and method blanks from the laboratory contain methylene chloride contamination. All methylene chloride concentrations in the water samples and associated soil samples are biased high and should be discounted as laboratory contamination. The data remain usable.

The prep blank for the inorganic analysis for soil samples in data package MH2RR7 had iron and manganese contamination. The associated soil sample results will have a high bias for manganese and iron. The data remain usable.

Sample EFSOD0001 and the lab rerun of sample EFSOD0001 had low recoveries for internal standard 1,4-Dichlorobenzene-d4. The sample results for the following compounds in this soil sample would have been rejected if data validation had been completed and may be considered biased low: bromoform, 1,3-dichlorobenzene; 1,4-dichlorobenzene; 1,2-dibromo-3-chloropropane, 1,2,4-trichlorobenzene, and 1,2,3-trichlorobenzene. It is recommended that these data are not used for decision-making for this property.

Several deuterated monitoring compound recoveries were high and outside of the QC limits for the volatile analysis for several soil samples. This issue may bias the following samples and compounds high:

**Table B**  
**Soil Compound Concentrations Biased High**

Field ID	Lab ID	Compound
EFSO0006	H2RQ3	Carbon Disulfide, Methyl Acetate
EFSO0009	H2RQ6RE	Methyl Acetate
EFSO0010	H2RQ7	Methyl Acetate
EFSO0010RE	H2RQ7RE	Carbon Disulfide, Methyl Acetate
EFSO0014	H2RR1	Methylene Chloride
EFSO14RE	H2RR1RE	Methyl Acetate, Carbon Disulfide
EFSO0018RE	H2RR5RE	Methyl Acetate
EFSO0019	H2RR6	Methyl Acetate, Methylene Chloride

The soil MS/MSD sample percent recoveries for all spiking compounds were low and outside of the QC limits for the volatile and aroclor analyses. Failure of MS/MSD percent



recoveries can cause values to be estimated for specific compounds. The low recoveries of the spiking compounds in these samples indicate matrix interference and may indicate a low bias for those compounds in that specific matrix. Data from similar matrix type samples should not be used for decision-making for this site.

The water MS/MSD samples failed percent recovery and were high in the matrix spike and low in the matrix spike duplicate for the compound gamma-BHC (lindane) in the pesticide analysis. Failure of MS/MSD percent recoveries can cause values to be estimated for the compound gamma-BHC (lindane). The case of failing high in the MS and failing low in the MSD leads to somewhat of a systemic error instead of matrix; error however, to determine if the error is systemic, further validation would be needed. The data still remain usable.

High relative percent differences (RPDs) between spikes and spike recoveries for the SVOC analysis were outside QC limits for soil samples in the data package H2RP8. Matrix spike duplicate recoveries were low for phenol and 4-nitrophenol. The relative percent difference between the MS and MSD exceeded the upper QC limit for phenol, 4-chloro-3-methylphenol, 4-nitrophenol, and pentachlorophenol. This indicates matrix interference. Non-detectable concentrations of these spiking compounds were found in the samples.

Surrogate spike recoveries were high in the instrument blank for the pesticide analysis: All surrogate spikes were significantly above the upper QC limit for the instrument blank. The 4,4'-DDE sample results for EFSO0018 (H2RR5) were biased high. The sample results are still useable.

### 6.2.2 Sensitivity

Sensitivity generally refers to the capability of a method or instrument to discriminate between small differences in analyte concentration and is generally discussed as detection limits. The detection limits of the field and laboratory methods are within the range of the benchmarks that were used to evaluate this property. All reporting limits were below the EPA RSLs for industrial soil and MCLs for water except for dibenzo(a,h)anthracene in soil, and antimony, cadmium, thallium, pentachlorophenol, and benzo(a)pyrene in the water. The dibenzo(a,h)anthracene reporting limit was slightly above the EPA RSL for

industrial soil in three samples. The reporting limits for antimony and pentachlorophenol were 10 times higher than the MCL in water samples. The reporting limit for cadmium was equal to the MCL, and the thallium reporting limit was 50 times the MCL in water samples. The benzo(a)pyrene reporting limit was 2.5 times higher than the MCL for water.

### 6.2.3 Precision

Precision is the measure of agreement among repeated measurements of the same property under identical, or substantially similar, conditions and is expressed as the RPD between the sample pairs.

A duplicate for soil metal analysis included a duplicate analysis of EFSO0001; the results contained failing RPDs for barium and calcium. The National Functional Guidelines require that the sample result must be greater than 5 times the Contract-Required Quantitation Limit (CRQL) to be considered for RPD analysis; both of the failing analytes were at least five times their associated CRQLs. Because laboratory variability arising from subsampling of non-homogenous soil samples is a common occurrence, a RPD limit of 35 percent is set.

**Table C**  
**Soil Sample Duplicates**

Analytes	EFSO0001	EFSOD0001	RPD
Methylene Chloride	18 ug/kg	17 ug/kg	6
Aluminum	8,280 mg/kg	8,620 mg/kg	4
Arsenic	8.8 mg/kg	9.9 mg/kg	12
Barium	221 mg/kg	150 mg/kg	38
Calcium	18,800 mg/kg	27,100 mg/kg	36
Chromium	11.5 mg/kg	12 mg/kg	4
Copper	19.2 mg/kg	16.1 mg/kg	18
Iron	11,200 mg/kg	12,400 mg/kg	10
Lead	31.7 mg/kg	34 mg/kg	7
Magnesium	3,270 mg/kg	3,990 mg/kg	20
Manganese	187 mg/kg	203 mg/kg	8
Nickel	10.3 mg/kg	11.1 mg/kg	7

**Table C**  
**Soil Sample Duplicates**

Analytes	EFSO0001	EFSOD0001	RPD
Zinc	58.1 mg/kg	52.3 mg/kg	11

The replicate for water metal analysis includes a duplicate analysis of EFGW01; the results contained failing RPDs for aluminum, lead, and manganese. The National Functional Guidelines require that the sample result must be greater than 5 times the CRQL to be considered for RPD analysis; both of the failing analytes were at least 5 times their associated CRQLs. Failure can indicate either an inhomogeneous sample or laboratory error. The RPD limit is 20 percent for water.

**Table D**  
**Water Sample Duplicates**

Analytes	EFGW01	EFGWD01	RPD
Aluminum	3,790 ppb	2,930 ppb	26
Calcium	314,000 ppb	282,000 ppb	11
Iron	37,100 ppb	32,000 ppb	15
Lead	107 ppb	82.2 ppb	26
Magnesium	84,300 ppb	78,100 ppb	8
Manganese	6,710 ppb	5,150 ppb	26
Sodium	136,000 ppb	133,000 ppb	2

#### 6.2.4 Representativeness

Representativeness is the measure of the degree to which data accurately and precisely represent a characteristic of a population parameter, variations at a sampling point, a process condition, or an environmental condition. Representativeness encompasses both the degree to which measurements reflect the actual concentration and the degree to which sampling units reflect the population they represent. Representativeness was addressed by adherence to TSOPs for sampling procedures, field and laboratory QA/QC procedures, appropriate sample material collection, homogenization methods, analytical methods, and sample preparation.

### 6.2.5 Completeness

Completeness is a measure of the amount of valid data obtained from a measurement system. The actual percentage of completeness is less important than the effect of completeness on the data set. Deviations from the FSP were made, detailed in Section 3.1, based on field observations. Samples were collected from each installed monitoring well and each core of soil from each monitoring well installation. Additional samples were collected from areas believed to be potential pathways for contaminants.

### 6.2.6 Comparability

Comparability is the qualitative term that expresses the confidence that two data sets can contribute to common interpretation and analysis and is used to describe how well samples within a data set, as well as two independent data sets, are interchangeable. Comparability was addressed by a data usability review comparing the results of field observations and laboratory analyses. Data were found to be comparable across data sets.

## 7.0 CONCLUSION

This Phase II investigation has characterized and delineated asbestos, hazardous waste, and LBP contamination at the ESBF property, along with confirming the presence of SVOCs in soils and TAL metals in groundwater that exceed health risk benchmarks (Appendix B).

1. LBP was identified on 4 interior surfaces of the office building out of the 30 surfaces analyzed. The *in situ* XRF analysis performed on these samples indicated that the lead content was greater than 1 mg/cm<sup>2</sup>; therefore, the results of this investigation indicate the building materials identified in Table 7 need to be handled as LBP if a renovation takes place in the office (HUD 2005).
2. Asbestos was identified in 69 samples at concentrations of greater than 1 percent in the ESBF main building, warehouse, and office. Asbestos was also identified in 30 debris pile areas and 4 surface soil areas outside the buildings on the rest of the ESBF property at concentrations of trace. Friable materials are materials that, when dry, can be crumbled, pulverized, or reduced to powder with hand pressure. The significance of friability is important because friable materials become airborne more readily and are, therefore, a greater health concern. Friable ACMs were identified throughout the ESBF main building and office along with areas outside the buildings in debris pile areas on the ESBF property. Therefore, the results of this investigation indicate the building materials and soils

identified in Tables 13 and 14 and Figure 4 need to be handled as ACM and ACS. The ACS and ACM outside the buildings on the ESBF property exceed CDPHE thresholds for asbestos concentrations and may present a health hazard for anybody who comes into direct contact with these areas and materials without proper PPE. The presence of friable ACMs outside the fenced area around the ESBF is also of significant concern and may require action based on CDPHE spill response requirements (Figure 4).

3. Fifty-nine containers were characterized by a START chemist during the April 5 through April 12, 2010 field sampling event. These containers will need to be disposed of appropriately by a certified waste disposal facility.
4. Five out of the 28 soil samples had elevated levels of SVOCs above the EPA RSLs for industrial soils. The ESBF property has not been securely managed over the years, and illegal trash dumping and other illegal uses have taken place, which could account for the SVOC contamination. Possible remediation and/or further assessment decisions should be based on the anticipated use of these specific areas and the significance of the contamination identified.
5. All 28 soil samples collected exceeded the EPA RSL for industrial soils for arsenic. However, arsenic levels ranged between 2.8 to 10.7 mg/kg, which are within the range of background levels observed in northeastern Colorado and are, therefore, likely naturally occurring and not indicative of environmental concern.
6. None of the water samples analyzed were above the MCL for VOCs, SVOCs, or pesticides. All six of the groundwater samples contained concentrations of lead, ranging from 26.9 to 119 ppb, which are above the MCL for drinking water. Five of the groundwater samples contained concentrations of arsenic, ranging from 10 to 25.9 ppb, which are above the MCL for drinking water. The beryllium concentrations for three of the water samples were above the MCL for drinking water, ranging from 4.1 to 4.6 ppb. The groundwater on the property is not currently being used, and has never been used historically, as a drinking water source. If the ESBF property's groundwater is ever to be used as a drinking water source, it could present a risk to human health without proper treatment.

## 8.0 CLEANUP ACTION RECOMENDATIONS

Based on the findings of this Phase II report, disposal options for asbestos, LBP, and hazardous waste on the ESBF property have been researched and are summarized in the following sections (Tables 10, 11,

12). These preliminary cost estimates were tabulated using quantified values from both 2010 START field sampling events in conjunction with the 2010 RSMeans Building Construction Cost Data manual and the RSMeans Environmental Remediation Estimating Methods 2<sup>nd</sup> Edition (RS Means 2010). Preliminary cost estimates for asbestos abatement and hazardous waste container disposal from local abatement and disposal contractors are located in Appendix C. Basic cost and volume estimates have been incorporated where appropriate, but should be used only to guide decision-making.

## **8.1 HAZARDOUS WASTE CONTAINER DISPOSAL**

Fifty-nine containers were found on the ESBF property that contained hazardous and non-hazardous contents. Twenty-five of these containers were HazClassed by a START chemist and organized into U.S. Department of Transportation hazard class waste streams. The other 24 containers that appeared to have the same contents based on material appearance, container appearance, or container label were grouped together and one sample was collected to represent the grouping. HazClass samples were not collected from the two factory sealed drums discovered on the property. Disposal of the 59 containers will need to be completed by a waste disposal facility working under a Part B permit for management of RCRA-regulated hazardous waste. Disposal prices of the containers can vary dependent upon disposal method and upon profiling and/or waste verification of the containers at the time of receipt by the contracted waste disposal facility. Two preliminary cost estimate scenarios were completed for disposal of the 59 containers identified at the ESBF property (Table 10). The first cost estimate scenario is based on a best-case scenario, if waste profiling of the 32 "DOT 3 flammable/combustible" fuel oil drums shows the drums contain less than 5 percent chlorinated halogens and if the two corrosive solvent drums can be disposed of by wastewater treatment. The second cost estimate scenario is based on a worst-case scenario, if waste profiling the 32 "DOT 3 flammable/combustible" fuel oil drums shows the drums contain greater than 5 percent chlorinated halogens and if the two corrosive solvent drums have to be disposed of by incineration. The cost of disposal for scenario one is \$20,247.60. The cost of disposal for scenario two is \$27,210.60 (Table 10). Contractor cost estimates for disposal of the 59 containers HazClassed by START at the ESBF property can be found in Appendix C.

## **8.2 ASBESTOS ABATEMENT**

Four hundred and twenty-seven construction material and surface soil samples were collected at the ESBF property and analyzed for asbestos by PLM analysis, of which 103 tested positive for asbestos. Approximately 138,000 sq ft of ACM was characterized and identified in the main

building, warehouse, and office at the ESBF property. A total of 5,000 cubic yards of ACM/ACS was delineated and identified on the ESBF property on the exterior of the buildings.

One preliminary cost estimate was researched and completed for this recognized environmental hazard, as abatement is the only cleanup option available. Cost for abatement of the ACM inside all three buildings on the property and ACM debris and ACS on the exterior of the ESBF property is \$2,960,298.00 (Table 11). Contractor cost estimates for abatement of only the ACM in the buildings of the property ranged from \$942,709.75 to \$1,890,000 (Appendix C).

### 8.3 LEAD REMOVAL AND MANAGEMENT-IN-PLACE FOR THE OFFICE

LBP was identified at concentrations greater than 1 mg/cm<sup>2</sup> on walls, window casing, and floors in the office building (Table 7). It is important to note that only one reading was taken from each room for each baseboards, window frames, window sashes, doors, and door frames. In the office building, one reading identified a window frame as containing LBP at greater than 1 mg/cm<sup>2</sup> and, therefore, all of the windows in the room (the entire second floor) were assumed to contain LBP.

Proper management and/or disposal may be required for materials containing greater than 1 mg/cm<sup>2</sup> at the office building (CDPHE undated). LBP in the building may present a significant danger to the health of workers participating in demolition or renovation activities. Airborne lead concentrations detected in excess of 30 micrograms per cubic meter (µg/m<sup>3</sup>) will subject employers to Occupational Safety and Health Administration (OSHA) regulations regarding working in an environment containing LBP (OSHA 2009).

LBP was identified on walls in the basement room at the bottom of the stairs, referred to as room 1. LBP on walls can be encapsulated and left in place, which will require routine maintenance under an Operations and Maintenance plan to ensure it remains encapsulated and does not become exposed. LBP was identified on window frames and floorboards on the second floor, referred to as room 8. When left in place, windows and floorboards can either be stripped of lead paint using a chemical process or have the LBP encapsulated by repainting. Removing LBP from windows and floorboards is preferred over encapsulation with new paint because moving and friction on these surfaces is more likely to cause the paint to be worn and exposed. Alternatively, windows and floorboards can be removed and replaced.

A basic cost estimate has been compiled using an estimate of 10 LBP-containing windows, 800 sq ft of LBP-containing walls, and 500 sq ft of LBP-containing floorboards. After removal is

complete, the waste must be tested by Toxicity Characteristic Leaching Procedure (TCLP) to determine if it must be disposed of as RCRA hazardous waste in a micro-encapsulation landfill or as construction debris in the county landfill (Safety Safety-Kleen 2010). The cost to remove, haul, and dispose of the LBP and conduct TCLP testing is approximately \$9,334 to \$11,300 (Table 12). This value was calculated using the 2010 RSMeans Building Construction Costs Data Guide and disposal estimates from the Grand Junction Safety-Kleen office (RSMeans 2010, Safety-Kleen 2010). The cost for removing LBP from windows includes all of the related parts, such as window casings and window sashes. The estimate was calculated under the assumption that the waste would be determined hazardous by a TCLP test.

The cost for removal and replacement of the windows and floorboards was not calculated because it is highly variable based on the materials selected to replace the removed items. If the grantee chooses to remove and replace windows, baseboards, and doors, a TCLP test of the debris would be required before disposal.

Additional quotes from local contractors should be obtained to determine a more accurate cost.



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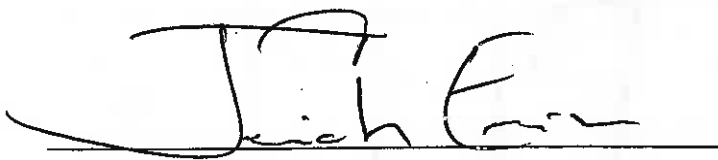
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10.0 ENVIRONMENTAL PROFESSIONAL'S QUALIFICATIONS, STATEMENT, AND  
SIGNATURE

This work was conducted by an environmental professional as specified in Section 7.5.1 of E1527-05 and defined pursuant to 40 CFR 10 (ASTM 2005b).

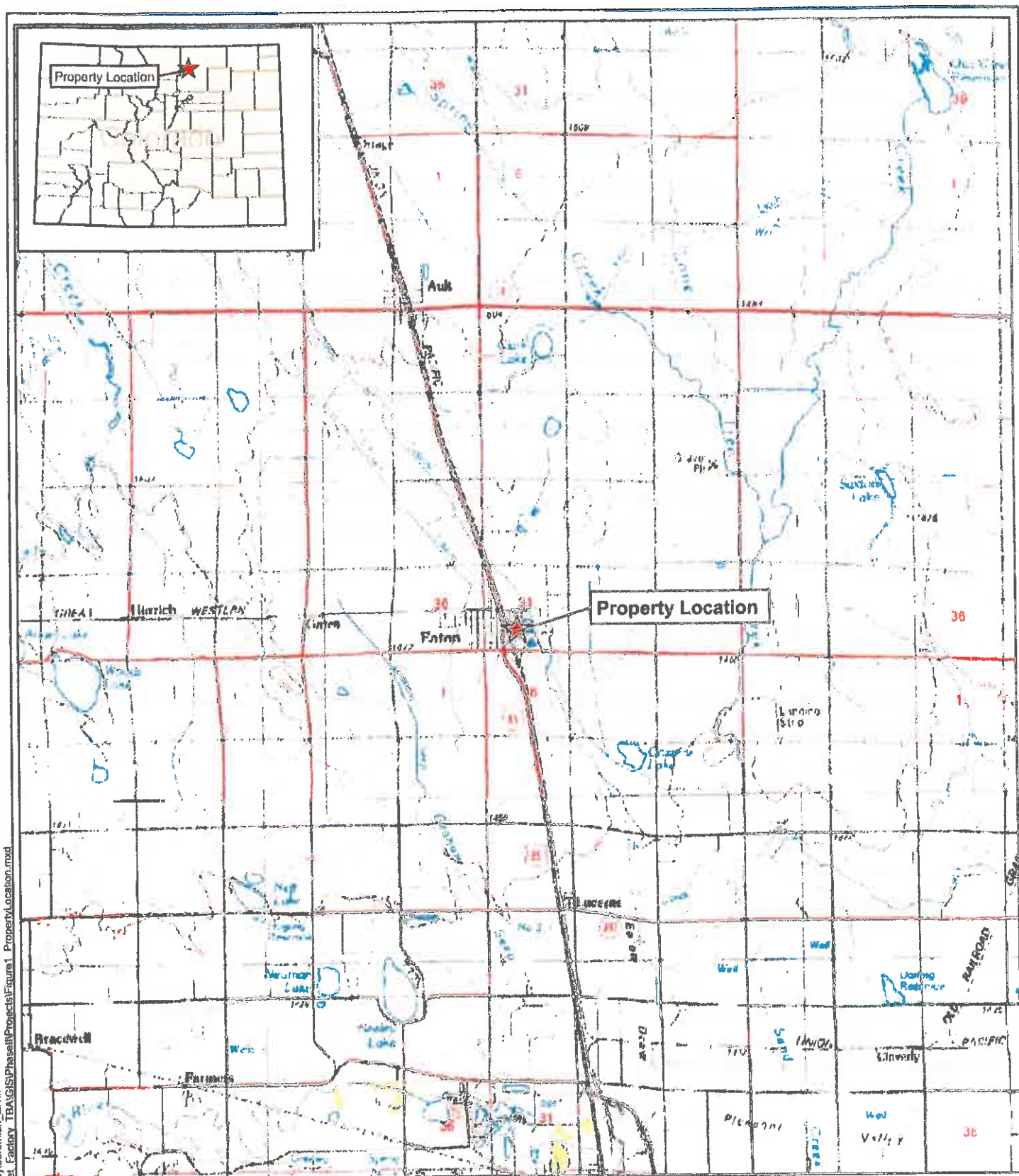
Jeremiah Ervin has a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience such as participation in the performance of all appropriate inquiries investigations, environmental site assessments or other site investigations including environmental analyses, investigations, and remediation, which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened releases (see 312.1(c)) to the subject property. Jeremiah Ervin remains current in his field through participation in continuing education or other activities.

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in 312.10 of 40 CFR 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed all appropriate inquiry in conformance with the standards and practices set forth in 40 CFR Part 312.

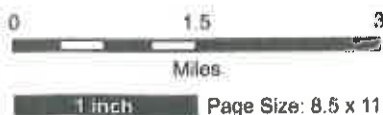


Date: 10/19/2010

Jeremiah Ervin, Environmental Scientist



Projection System:  
 Universal Transverse  
 Mercator Zone 13 North  
 North American Datum 1983



TDD Title: **Eaton Sugar Beet  
 Factory TBA**

Figure: 1

Figure Title: **Property Location Map**

TDD County: **WELD**  
 TDD State: **CO**

TDD: **0912-06**  
 Date: **10 2010**

**URS**  
 OPERATING SERVICES

Sources:  
 Terra Server 1975



**TABLE 9**  
**Eaton Sugar Beet Factory TBA Hazard Classification Summary**

Sample ID	Bulk Segregation	Hazard Class	Hazard	Container Type	Size	Manufacturer Label	DOT Haz Label
EBHZ01	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Poly Drum	55 gallon	None	None
EBHZ02	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Poly Drum	55 gallon	None	None
EBHZ03	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Poly Drum	55 gallon	None	None
EBHZ04	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Poly Drum	55 gallon	None	None
EBHZ05	1	Chlorine Halogen Presence	Chlorinated Solvent	Poly Drum	35 gallon	None	None
EBHZ06	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Poly Drum	55 gallon	Garret Callahan Company. Mostly Unreadable.	None
EBHZ07	1	Corrosive	Corrosive Solvent	Poly Container	5 gallon	EDTA 39%. Danger Vapor Harmful or fatal if Swallowed	None
EBHZ08	1	Corrosive	Corrosive Solvent	Poly Drum	35 gallon	None	None
EBHZ09	1	DOT 3 Flammable/Combustible	Oily Sludge	Metal Bucket	5 gallon	None	None
EBHZ10	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	55 gallon	Caustic Soda Beads	Corrosive
EBHZ11	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	55 gallon	Caustic Soda Beads	Corrosive
EBHZ12	1	DOT 3 Flammable/Combustible	Machine Grease	Metal Drum	55 gallon	None	None
EBHZ13	1	DOT 3 Flammable/Combustible	Machine Grease	Metal Drum	55 gallon	None	None
EBHZ14	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	35 gallon	None	None
EBHZ15	2	Oxidizer	Perchlorate	Metal Drum	55 gallon	None	None
EBHZ16	1	DOT 3 Flammable/Combustible	Machine Grease	Metal Drum	35 gallon	Conoco Co., Super-sto Grease	None
EBHZ17	1	DOT 3 Flammable/Combustible	DOT 3 Flammable/Combustible	Metal Drum	55 gallon	None	None
EBHZ18	1	DOT 3 Flammable/Combustible	DOT 3 Flammable/Combustible	Metal Container	5 gallon	None	None
EBHZ19	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	55 gallon	Conoco Oil Company	None
EBHZ20	32	DOT 3 Flammable/Combustible	Fuel Oil	Metal Drum	55 gallon	None	None
EBHZ21	1	DOT 3 Flammable/Combustible	Fuel Oil	Metal Drip Pan	1 gallon	None	None
EBHZ22	1	DOT 3 Flammable/Combustible	Fuel Oil	Metal Drip Pan	1 gallon	None	None
EBHZ23	1	DOT 3 Flammable/Combustible	Fuel Oil	Metal Drip Pan	1 gallon	None	None
EBHZ24	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	55 gallon	Caustic Soda Beads	Corrosive
EBHZ25	1	Not Reactive. Toxic until verified by lab.	Not Reactive. Toxic until verified by lab.	Metal Drum	5 gallon	None	None
Factory Sealed Drum 01	1	NA	Unknown	Metal Drum	55 gallon	None	None
Factory Sealed Drum 02	1	NA	Pesticide	Metal Bucket	6 gallon	West Fog; A fogging pesticide used to control insect pests.	None

**TABLE 8**  
**Laboratory Results for Paint Chip Samples**

Location	Object	Color	Condition	Substrate	Lead (%)
EF012D01	Int. Wall	White	Poor	Brick	BRL
EF011D01	Int. Wall	White	Poor	Plaster	3.90
EFLP01	Int. Wall	White	Fair	Metal	0.16
EFLP02	Int. Wall	White	Poor	Brick	0.05
EFLP03	Int. Wall	White	Poor	Brick	0.07
EFLP04	Int. Wall	White/Blue	Poor	Metal	4.60
EFLP05	Int. Wall	White	Poor	Metal	0.11
EFLP06	Int. Wall	White/Yellow	Poor	Metal	0.04
EFLP07	Int. Wall	Gray	Poor	Metal	2.80
EFLP08	Int. Wall	Yellow	Poor	Wood	8.00
EFLP09	Int. Wall	Off-White	Poor	Metal	0.08
EFLP10	Int. Wall	White	Poor	Brick	0.76
EFLP11	Int. Wall	White	Poor	Metal	0.28

BRL Below Reportable Limit  
 U Indicates analyte is undetected at the detection limit  
 mg/cm<sup>2</sup> milligram per square meter  
 XRF X Ray Fluorescence  
**BOLD** Lead > 0.5% by weight / EPA Action level  
 > greater than  
 % percent  
 +/- plus or minus

TABLE 3 (cont.)  
Soil Pesticides and PCBs Sample Results  
Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])

Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels – Migration to Groundwater	EFSO1803 H2RS1	EFSO1804 H2RS2	EFSO1805 H2RS3	EFSO1806 H2RS4	EFSO1807 H2RS5	EFSO1808 H2RS6
Analyte								
Pesticides								
4,4'-DDE	7,000	54,000	3.9 U	1 J	5.9	3.7 U	3.8 U	3.5 U
4,4'-DDT	7,000	32,000	3.9 U	3.9 U	3.4 U	3.7 U	3.8 U	3.5 U
Aldrin	100	500	2 U	2 U	1.8 U	1.9 U	1.9 U	1.8 U
alpha-Chlordane	6,500	10,000	2 U	2 U	1.8 U	1.9 U	1.9 U	1.8 U
Dieldrin	110	4	3.9 U	3.9 U	3.4 U	3.7 U	3.8 U	3.5 U
Endrin aldehyde	-	-	3.9 U	3.9 U	3.4 U	3.7 U	3.8 U	3.5 U
gamma-Chlordane	6,500	10,000	2 U	2 U	1.8 U	1.9 U	1.9 U	1.8 U
Heptachlor	380	23,000	2 U	2 U	1.8 U	1.9 U	1.9 U	1.8 U
Heptachlor epoxide	190	700	2 U	2 U	1.8 U	1.9 U	1.9 U	1.8 U
PCBs								
Aroclor-1248	740	3	39 U	39 U	34 U	37 U	38 U	35 U
Aroclor-1254	740	5.1	39 U	39 U	34 U	37 U	38 U	35 U

B Blank Contamination  
D Indicates that a dilution was performed  
J The associated numerical value is an estimated quantity because quality control criteria were not met. Presence of the analyte is reliable.  
U The analyte was not detected above the Contract-Required Quantitation Limit.  
**BOLD** Analyte detected  
\* Result above the EPA Regional Screening Level



**TABLE 4**  
**Inorganic Soil Sample Results**  
Concentrations in milligrams per kilogram (mg/kg) (parts per million [ppm])

Sample ID: Lab Sample ID: Location: Analyte (Abbrev)	EPA Regional Screening Level for Industrial Soil	EPA Soil Risk- Based SSL – Migration to Groundwater	EFSO0001 MH2RP8	EFSO0002 MH2RP9	EFSO0003 MH2RQ0	EFSO0004 MH2RQ1	EFSO0005 MH2RQ2	EFSO0006 MH2RQ3	EFSO0007 MH2RQ4	EFSO0008 MH2RQ5	EFSO0009 MH2RQ6	EFSO0010 MH2RQ7	EFSO0011 MH2RQ8
Aluminum (Al)	990,000	550,000	8,280	7,760	3,700	3,620	4,460	13,300	7,720	2,370	6,450	9,600	7,980
Antimony (Sb)	410	0.66	7.5 U	6.9 U	6.3 U	6.3 U	7.7 U	8 U	6.6 U	6.5 U	7.4 U	6.8 U	6.5 U
Arsenic (As)	1.6	0.013	*8.8	*11.1	*4	*2.7	*2.6	*8.8	*4.8	*1.8	*3.9	*5.8	*4.9
Barium (Ba)	190,000	300	221	312	52.8	29.2	63.5	227	148	96.3	245	565	131
Beryllium (Be)	200	58	0.6 J	0.71	0.27 J	0.24 J	0.29 J	0.79	0.47 J	0.25 J	0.54 J	1.1	0.46 J
Cadmium (Cd)	800	1	0.29 J	0.34 J	0.53 U	0.52 U	0.45 J	1.7	0.41 J	0.41 J	0.65	0.33 J	0.54 U
Calcium (Ca)			18,800	26,400	11,200	17,200	214,000	48,400	47,800	267,000	34,900	32,200	28,100
Chromium (Cr)			11.5	9.9	6.3	6.7	11.5	18.7	10.6	10.6	9.5	9.9	8.5
Cobalt (Co)	300	0.49	5 J	4.3 J	2.6 J	2.2 J	6.4 U	8.5	4.4 J	5.5 U	3.4 J	4.5 J	5.3 J
Copper (Cu)	41,000	51	19.2	27	8.2	5.4	45	82.6	18.1	15.8	23.7	36.6	7.3
Iron (Fe)	720,000	640	11,200	10,800	7,590	6,260	5,330	17,600	10,000	3,970	9,580	14,800	9,990
Lead (Pb)	800	15	31.7	41.7	122	*1,350	14	78.6	27.1	14.9	40.3	84.3	7.5
Magnesium (Mg)			3,270	3,790	1,590	1,540	1,970	5,440	4,270	2,940	3,370	2,680	4,280
Manganese (Mn)	23,000	57	187	197	130	114	210	625	202	133	203	235	201
Mercury (Hg)	34	30	0.2	0.3	0.055 J	0.11 U	0.086 J	1	1.3	0.23	0.27	0.3	0.045 J
Nickel (Ni)	47,000	48	10.3	9	4.7	4.2	5.2	17.2	9.3	3.9 J	7.2	8.9	9
Potassium (K)			2,200	2,420	1,310	1,090	1,870	3,880	2,250	682	2,090	1,940	2,280
Selenium (Se)	5,100	1	4.4 U	4 U	3.7 U	3.7 U	4.5 U	4.7 U	3.8 U	3.8 U	4.3 U	3.9 U	3.8 U
Silver (Ag)	5,100	2	1.3 U	1.2 U	1.1 U	1 U	1.3 U	1.3 U	1.1 U	1.1 U	1.2 U	1.1 U	1.1 U
Sodium (Na)			246 J	568 J	528 U	523 U	557 J	304 J	548 U	545 U	537 J	1500	540 U
Thallium (Tl)			3.1 U	2.9 U	2.6 U	2.6 U	3.2 U	3.3 U	2.7 U	2.7 U	3.1 U	2.8 U	2.7 U
Vanadium (V)	72	3	24.5	21.1	14.2	11.7	12.4	35.2	20.7	8.7	17.3	24	24.2
Zinc (Zn)	310,000	680	58.1	74.8	25.6	18.6	41.8	300	79.5	36.2	102	138	29.1



**TABLE 4 (cont.)**  
**Inorganic Soil Sample Results**  
 Concentrations in milligrams per kilogram (mg/kg) (parts per million [ppm])

Sample ID: Lab Sample ID: Location: Analyte (Abbrev)	EPA Regional Screening Level for Industrial Soil	EPA Soil Risk- Based SSL Migration to Groundwater	EFSO0012 MH2RQ9	EFSO0013 MH2RR0	EFSO0014 MH2RR1	EFSO0015 MH2RR2	EFSO0016 MH2RR3	EFSO0017 MH2RR4	EFSO0018 MH2RR5	EFSO0019 MH2RR6	EFSO0020 MH2RR7	EFSO0001 MH2RR8	EFSO1801 MH2RR9
Aluminum (Al)	990,000	550,000	6,510	2,890	4,600	8,260	7,470	8,610	12,300	8,890	9,500	8,620	10,600
Antimony (Sb)	410	0.66	7.6 U	7 U	7.2 U	6.7 U	6.5 U	6.9 U	7 U	6.6 U	7 U	6.9 U	6.9 U
Arsenic (As)	1.6	0.013	*3.3	*2.8	*4.2	*6.1	*5.5	*6.7	*9.6	*9.1	*6.9	*9.9	*6.6
Barium (Ba)	190,000	300	325	160	245	124	105	241	265	195	263	150	115
Beryllium (Be)	200	58	1.1	0.24 J	0.47 J	0.56	0.47 J	0.59	0.78	0.57	0.68	0.57 J	0.63
Cadmium (Cd)	800	1	0.63 U	0.59 U	0.31 J	0.19 J	0.2 J	0.44 J	0.31 J	1.2	0.38 J	0.31 J	0.2 J
Calcium (Ca)			54,400	14,000	16,800	28,500	12,400	12,400	10,100	8,230	16,800	27,100	4,040
Chromium (Cr)			10.8	3.6	5.2	9.1	8.8	12.2	13.6	21.7	12.6	12	12.1
Cobalt (Co)	300	0.49	4.9 J	5.9 U	3 J	4.2 J	4.1 J	4.4 J	5.6 J	5.3 J	5.3 J	5 J	5.3 J
Copper (Cu)	41,000	51	17.5	10.3	11.5	14.1	10.6	18.2	20.7	38.4	19.1	16.1	10
Iron (Fe)	720,000	640	5,660	5,400	7,590	9,550	9,870	11,200	14,000	47,600	12,300	12,400	12,300
Lead (Pb)	800	15	9.2	11.6	30.2	20.7	16.4	65.2	30.2	74.2	30.6	34	12
Magnesium (Mg)			3,770	1,660	2,380	3,650	3,090	3,140	3,720	2,760	3,490	3,990	3,200
Manganese (Mn)	23,000	57	97.8	104	132	183	186	225	272	345	240	203	217
Mercury (Hg)	34	30	0.5	0.36	0.25	1	0.19	0.31	0.25	0.4	0.28	0.16	0.075 J
Nickel (Ni)	47,000	48	8.9	3.3 J	5.4	8.7	8.6	8.7	11.8	16.6	11.6	11.1	12.4
Potassium (K)			2,600	1,750	1,670	2,650	2,350	2,970	2,590	3020	4,660	2,490	2,230
Selenium (Se)	5,100	1	4.4 U	4.1 U	4.2 U	3.9 U	3.8 U	4 U	4.1 U	3.9 U	4.1 U	4 U	4 U
Silver (Ag)	5,100	2	1.3 U	1.2 U	1.2 U	1.1 U	1.1 U	1.1 U	1.2 U	1.1 U	1.2 U	1.2 U	1.1 U
Sodium (Na)			563 J	235 J	600 U	555 U	542 U	330 J	275 J	552 U	584 U	577 U	575 U
Thallium (Tl)			3.2 U	2.9 U	3 U	2.8 U	2.7 U	2.9 U	2.9 U	2.8 U	2.9 U	2.9 U	2.9 U
Vanadium (V)	72	3	31.1	8.7	14.5	20.8	21.4	21.2	28.1	31.6	24.7	25.4	26.6
Zinc (Zn)	310,000	680	10.6	24.3	41.8	38.8	43.2	111	56.8	272	66.1	52.3	39.1

**TABLE 4 (cont.)**  
**Inorganic Soil Sample Results**  
**Concentrations in milligrams per kilogram (mg/kg) (parts per million [ppm])**

Analyte	Sample ID: Lab Sample ID: Location: (Abbrev)	EPA Regional Screening Level for Industrial Soil	EPA Soil Risk- Based SSL – Migration to Groundwater	EFSO1802 MH2RS0	EFSO1803 MH2RS1	EFSO1804 MH2RS2	EFSO1805 MH2RS3	EFSO1806 MH2RS4	EFSO1807 MH2RS5	EFSO1808 MH2RS6
Aluminum	(Al)	990,000	550,000	9,670	5,480	9,330	3,060	10,100	8,100	7,810
Antimony	(Sb)	410	0.66	7 U	7.2 U	6.6 U	6.5 U	6.9 U	6.8 U	6.6 U
Arsenic	(As)	1.6	0.013	*10.7	*3.9	*5.5	*3.6	*6.2	*5.1	*4.9
Barium	(Ba)	190,000	300	251	78	104	47.9	92.9	264	136
Beryllium	(Be)	200	58	0.76	0.35 J	0.51 J	0.24 J	0.58	0.48 J	0.51 J
Cadmium	(Cd)	800	1	0.32 J	0.38 J	0.22 J	0.54 U	0.2 J	0.26 J	0.55 U
Calcium	(Ca)			10,900	108,000	21,200	5,750	2,730	28,100	24,500
Chromium	(Cr)			12.4	11.2	13	4.8	11.7	10	8.9
Cobalt	(Co)	300	0.49	5.8 J	2.4 J	5.3 J	2.5 J	4.9 J	4.6 J	4.2 J
Copper	(Cu)	41,000	51	22.1	44.8	10	5	9	7.6	7.7
Iron	(Fe)	720,000	640	12,200	6,650	11,400	6,620	12,100	10,600	10,400
Lead	(Pb)	800	15	30.3	33.1	9.6	6.8	10.2	8.9	9.2
Magnesium	(Mg)			3,320	2,530	4,760	1,360	2,710	5,130	3,990
Manganese	(Mn)	23,000	57	266	155	268	171	207	185	207
Mercury	(Hg)	34	30	0.22	0.18	0.065 J	0.036 J	0.07 J	0.04 J	0.041 J
Nickel	(Ni)	47,000	48	12.3	6.1	12.6	3.9 J	11.5	9.9	7.4
Potassium	(K)			2,230	2,530	1,940	1,010	2,200	1,940	1,730
Selenium	(Se)	5,100	1	4.1 U	4.2 U	3.8 U	3.8 U	4 U	4 U	3.9 U
Silver	(Ag)	5,100	2	1.2 U	1.2 U	1.1 U	1.1 U	1.1 U	1.1 U	1.1 U
Sodium	(Na)			225 J	314 J	549 U	410 J	766	571 U	550 U
Thallium	(Tl)			2.9 U	3 U	2.7 U	2.7 U	2.9 U	2.9 U	2.8 U
Vanadium	(V)	72	3	29.6	14.6	26.5	13.6	25.4	22.1	22.5
Zinc	(Zn)	310,000	680	48.9	41.3	36.4	17.7	37.3	33.1	30

B Blank Contamination  
 D Indicates that a dilution was performed  
 J The associated numerical value is an estimated quantity because quality control criteria were not met. Presence of the analyte is reliable.  
 U The analyte was not detected above the Contract-Required Quantitation Limit.  
**BOLD** Analyte detected  
 \* Result above the EPA Regional Screening Level

TABLE 5  
Groundwater Organic Sample Results  
Concentrations in micrograms per liter (µg/L) (parts per billion [ppb])

Analytes:	Sample ID#: Lab Sample ID: Location:	State of Colorado MCL / MCLG (Drinking Water)	SCDM (Drinking Water) (1/28/2004)		EFGW01 H2RS8	EFGW02 H2RS9	EFGW03 H2RT0	EFGW06 H2RT3	EFGW07 H2RT4	EFGW08 H2RT5	EFGWD01 H2RT6	EFSORINS1801 H2RT7
			RDSC	CRSC								
Volatiles												
Acetone			33,000		8.3	4.5 J	2.6 J	5 U	5 U	5 U	5 U	5 U
Chloroform			360		0.92	0.5 U	0.5 U	0.5 U	0.5 U	0.97	0.5 U	0.5 U
Methyl acetate					0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Methylene chloride	5.0		2200	11	0.51	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Semi-Volatiles												
Benzo(a)anthracene				0.12	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Benzo(a)pyrene	0.2			0.012	**5 U	**5 U	**5 U	**5 U	**5 U	**5 U	**5 U	**5 U
Benzo(k)fluoranthene				1.2	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Carbazole				4.3	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Indeno(1,2,3-cd)pyrene				0.12	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Pentachlorophenol	1.0		1,100	0.71	**10 U	**10 U	**10 U	**10 U	**10 U	**10 U	**10 U	**10 U
Pesticides												
Aldrin			1.1	0.005	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Dieldrin			1.8	0.0053	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Heptachlor	0.4		18	0.019	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Heptachlor epoxide	0.2		0.47	0.0094	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U

D Indicates that a dilution was performed  
J The associated numerical value is an estimated quantity because quality control criteria were not met. Presence of the analyte is reliable.  
U The analyte was not detected above the Contract-Required Quantitation Limit.  
MCL/MCLG Maximum Contaminant Level / Maximum Contaminant Level Goal  
BOLD Analyte detected  
\* Result above the Maximum Contaminant Level / Maximum Contaminant Level Goal  
\*\* Reporting Limit is ≥ the MCL/MCLG

**TABLE 6**  
**Groundwater Inorganic Sample Results**  
 Concentrations in micrograms per liter (µg/L) (parts per billion [ppb])

Analyte	Sample ID: Lab Sample ID: Location: (Abbrev)	State of Colorado MCL / MCLG (Drinking Water)	SCDM (Drinking Water) (1/28/2004)		EFGW01 MH2RS8	EFGW02 MH2RS9	EFGW03 MH2RT0	EFGW06 MH2RT3	EFGW07 MH2RT4	EFGW08 MH2RT5	EFGWD01 MH2RT6	EFSORINS1801 MH2RT7
			RDSC	CRSC								
Aluminum	(Al)				3,790	3,830	1,390	2,780	3,140	5,620	2,930	200 U
Antimony	(Sb)	6.0	15		**60 U	**60 U	**60 U	**60 U	**60 U	**60 U	**60 U	**60 U
Arsenic	(As)	10	11	0.057	*12.1	*10 J	9 J	*17.4	*25.9	*20.9	9.5 J	**10 U
Barium	(Ba)	2,000	2,600		79.4 J	91.6 J	200 U	200 U	80.5 J	79.4 J	200 U	200 U
Beryllium	(Be)	4.0	73		*4.6 J	*4.1 J	1.9 J	2.5 J	3.6 J	7.3	3.4 J	**5 U
Cadmium	(Cd)	5.0	18		**5 U	1.9 J	**5 U	**5 U	2.1 J	1.7 J	**5 U	**5 U
Calcium	(Ca)				314,000	458,000	447,000	296,000	234,000	311,000	282,000	5,000 U
Chromium	(Cr)	100	110		37.3	9 J	6.8 J	8.9 J	27.5	58	26.4	10 U
Cobalt	(Co)				156	44 J	31.7 J	49.3 J	76.6	146	114	50 U
Copper	(Cu)	1,300			47.1	19.3 J	18.9 J	20 J	53.1	67.5	33.7	25 U
Iron	(Fe)				37,100	2,660	3,500	7,450	27,000	20,800	32,000	100 U
Lead	(Pb)	15			*107	*44.6	*26.9	*58.4	*119	*113	*82.2	10 U
Magnesium	(Mg)				84,300	81,800	227,000	84,100	101,000	88,800	78,100	5,000 U
Manganese	(Mn)		5,100		6,710	2,810	1,980	1,410	4,380	6,670	5,150	15 U
Mercury	(Hg)	2.0	11		0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Nickel	(Ni)		730		62.5	30.6 J	22.9 J	22.4 J	41.2	64.2	44.3	40 U
Potassium	(K)				10,900	10,400	20,400	8,670	11,400	12,100	9,950	5,000 U
Selenium	(Se)	50	180		20.6 J	35 U	47.8	35 U	17.3 J	35 U	19.3 J	35 U
Silver	(Ag)		180		10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Sodium	(Na)				136,000	100,000	331,000	119,000	141,000	117,000	133,000	5,000 U
Thallium	(Tl)	0.50			**25 U	**25 U	**25 U	**25 U	**25 U	**25 U	**25 U	**25 U
Vanadium	(V)		260		103	32.8 J	42.5 J	61	199	228	78.1	50 U
Zinc	(Zn)		11,000		46.9 J	60 U	60 U	60 U	43.6 J	40.9 J	33.7 J	60 U

D Indicates that a dilution was performed  
 J The associated numerical value is an estimated quantity because quality control criteria were not met. Presence of the analyte is reliable.  
 U The analyte was not detected above the Contract-Required Quantitation Limit.  
 MCL/MCLG Maximum Contaminant Level / Maximum Contaminant Level Goal  
 BOLD Analyte detected  
 \* Result above the Maximum Contaminant Level / Maximum Contaminant Level Goal  
 \*\* Reporting Limit is ≥ the MCL/MCLG

**TABLE 7**  
**XRF Results for Lead-Based Paint in Office Building**

Sample ID	Location	Object	Color	Condition	Substrate	Lead (mg/cm <sup>2</sup> )	+/- Lead (mg/cm <sup>2</sup> )
EF011A01	Office Building	Int. Wall	White	Poor	Plaster	>1.00	0.02
EF011B01	Office Building	Int. Wall	White	Poor	Plaster	0.00	0.00
EF011D01	Office Building	Int. Wall	White	Poor	Plaster	3.50	0.00
EF011C01	Office Building	Int. Wall	White	Poor	Plaster	>1.03	0.05
EF011D10	Office Building	Built-in Furniture	White	Poor	Wood	0.13	0.06
EF012A01	Office Building	Int. Wall	White	Poor	Plaster	0.00	0.00
EF012B10	Office Building	Built-in Furniture	White	Fair	Wood	0.02	0.04
EF012B01	Office Building	Int. Wall	White	Poor	Plaster	0.00	0.00
EF012C01	Office Building	Int. Wall	White	Poor	Concrete	0.00	0.00
EF012D01	Office Building	Int. Wall	White	Poor	Brick	0.00	0.00
EF012E01	Office Building	Int. Wall	White	Poor	Concrete	0.00	0.00
EF011D07	Office Building	Baseboard	Gray	Poor	Wood	0.05	0.08
EF013A01	Office Building	Int. Wall	White	Poor	Drywall	0.00	0.00
EF013B01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF013C01	Office Building	Int. Wall	Tan	Poor	Drywall	0.00	0.00
EF013D01	Office Building	Int. Wall	White	Poor	Drywall	0.00	0.00
EF014A01	Office Building	Int. Wall	White	Poor	Drywall	0.00	0.00
EF014B01	Office Building	Int. Wall	White	Poor	Drywall	0.00	0.00
EF015A01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF015B01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF015D02	Office Building	Window Casing	White	Poor	Wood	0.15	0.08
EF016A01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF016B01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF016C01	Office Building	Int. Wall	White	Fair	Drywall	0.00	0.00
EF017D01	Office Building	Int. Wall	Green	Fair	Plaster	0.77	0.21
EF013A10	Office Building	Built-in Furniture	White	Fair	Wood	0.02	0.02
EF018A07	Office Building	Baseboard	Gray	Fair	Wood	0.22	0.08
EF018A09	Office Building	Floor	Red	Fair	Wood	4.04	0.88
EF018A02	Office Building	Window Casing	White	Fair	Wood	>1.00	0.07
EF018B05	Office Building	Door Jam	White	Fair	Wood	0.27	0.12

Ext – exterior  
 mg/cm<sup>2</sup> – milligram per square meter



TABLE 2 (cont.)  
Soil Volatiles and Semi-Volatiles Sample Results  
Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])

Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels - Migration to Groundwater	EFSO0013 H2RR0	EFSO0014 H2RR1	EFSO0015 H2RR2	EFSO0016 H2RR3	EFSO0016 H2RR3DL (Dilution of H2RR3)	EFSO0017 H2RR4	EFSO0018 H2RR5	EFSO0019 H2RR6	EFSO0020 H2RR7	EFSOD0001 H2RR8	EFSO1801 H2RR9	EFSO1802 H2RS0
Analyte														
Volatiles														
Acetone	61,000,000	4,500	12 U	10 U	11 U	11 U	-	11 U	11 U	10 U	11 U	12 U	11 U	12 U
Chloroform	1,500	0.053	5.9 U	5.1 U	5.7 U	5.4 U	-	5.5 U	5.7 U	5.2 U	5.4 U	5.8 U	5.6 U	5.8 U
Methyl acetate	1,000,000,000	7,500	5.9 U	5.1 U	3.1 J	5.4 U	-	5.5 U	5.3 J	8.8	5.4 U	3.3 J	5.6 U	5.8 U
Methylene chloride	53,000	1.2	5.9 U	6.2	5.7 U	5.4 U	-	3.4 J	4.9 J	6.5	5.4 U	17	14	12
Semi-Volatiles														
2-Methylnaphthalene	4,100,000	750	200 U	180 U	190 U	140 J	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Acenaphthene	33,000,000	2200,000	200 U	180 U	190 U	410	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Acenaphthylene	-	-	200 U	180 U	190 U	330	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Anthracene	170,000,000	360,000	200 U	86 J	190 U	1100	980 D	140 J	200 U	190 U	190 U	200 U	200 U	200 U
Benzo(a)anthracene	2,100	10	200 U	190	190 U	*3,800 E	*3,200 D	270	200 U	190 U	200	200 U	200 U	200 U
Benzo(a)pyrene	210	3.5	200 U	190	190 U	*2,300	*3,400 D	*250	200 U	190 U	*220	200 U	200 U	200 U
Benzo(b)fluoranthene	2,100	35	200 U	180 J	190 U	*3,100 E	1,600 D	170 J	200 U	190 U	160 J	200 U	200 U	200 U
Benzo(g,h,i)perylene	-	-	200 U	140 J	190 U	2,700	2,200 D	190 J	200 U	190 U	160 J	200 U	200 U	200 U
Benzo(k)fluoranthene	21,000	350	200 U	180 J	190 U	3,100 E	3,000 D	230	200 U	190 U	180 J	200 U	200 U	200 U
Bis(2-ethylhexyl)phthalate	120,000	1,100	200 U	180 U	190 U	180 U	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Carbazole	-	-	200 U	180 U	190 U	380	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Chrysene	210,000	1,100	200 U	220	190 U	4,300 E	3,500 D	310	84 J	190 U	250	200 U	200 U	200 U
Dibenzo(a,h)anthracene	210	11	200 U	180 U	190 U	*1,500	**920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Dibenzofuran	1,000,000	680	200 U	180 U	190 U	220	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Di-n-butylphthalate	62,000,000	9,200	200 U	180 U	190 U	180 U	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Fluoranthene	22,000,000	160,000	87 J	320	190 U	6,600 E	5,600 D	570	100 J	190 U	350	200 U	200 U	200 U
Fluorene	22,000,000	27,000	200 U	180 U	190 U	360	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Indeno(1,2,3-cd)pyrene	2,100	120	200 U	120 J	190 U	*2,200	1,900 D	160 J	200 U	190 U	140 J	200 U	200 U	200 U
Naphthalene	18,000	0.47	200 U	180 U	190 U	250	920 U	190 U	200 U	190 U	190 U	200 U	200 U	200 U
Pentachlorophenol	9,000	5.7	390 U	350 U	370 U	360 U	1,800 U	380 U	390 U	360 U	380 U	380 U	380 U	390 U
Phenanthrene	-	-	200 U	360	190 U	5,400 E	4,000 D	676	85 J	190 U	370	200 U	200 U	200 U
Pyrene	29,000,000	4,200,000	92 J	370	110 J	6,400 E	7,400 D	830	140 J	190 U	400	200 U	200 U	200 U

**TABLE 2 (cont.)**  
**Soil Volatiles and Semi-Volatiles Sample Results**  
**Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])**

Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels – Migration to Groundwater	EFSO1803 H2RS1	EFSO1804 H2RS2	EFSO1805 H2RS3	EFSO1806 H2RS4	EFSO1807 H2RS5	EFSO1808 H2RS6
<b>Analyte</b>								
<b>Volatiles</b>								
Acetone	61,000,000	4,500	12 U	12 U	10 U	11 U	11 U	11 U
Chloroform	1,500	0.053	5.9 U	5.8 U	5.2 U	5.5 U	5.7 U	5.4 U
Methyl acetate	1,000,000,000	7,500	5.9 U	5.8 U	5.2 U	5.5 U	5.7 U	5.4 U
Methylene chloride	53,000	1.2	14	5.8 U	8.2	11	9.3	14
<b>Semi-Volatiles</b>								
2-Methylnaphthalene	4,100,000	750	200 U	200 U	180 U	190 U	190 U	180 U
Acenaphthene	33,000,000	2200,000	200 U	200 U	180 U	190 U	190 U	180 U
Acenaphthylene	-	-	200 U	200 U	180 U	190 U	190 U	180 U
Anthracene	170,000,000	360,000	200 U	200 U	180 U	190 U	220	180 U
Benzo(a)anthracene	2,100	10	200 U	200 U	180 U	190 U	420	180 U
Benzo(a)pyrene	210	3.5	200 U	79 J	180 U	190 U	*360	180 U
Benzo(b)fluoranthene	2,100	35	200 U	200 U	180 U	190 U	170 J	180 U
Benzo(g,h,i)perylene	-	-	200 U	85 J	180 U	190 U	240	180 U
Benzo(k)fluoranthene	21,000	350	200 U	200 U	180 U	190 U	330	180 U
Bis(2-ethylhexyl)phthalate	120,000	1,100	200 U	89 J	180 U	190 U	190 U	180 U
Carbazole	-	-	200 U	200 U	180 U	190 U	100 J	180 U
Chrysene	210,000	1,100	200 U	200 U	180 U	190 U	420	180 U
Dibenzo(a,h)anthracene	210	11	200 U	200 U	180 U	190 U	100 J	180 U
Dibenzofuran	1,000,000	680	200 U	200 U	180 U	190 U	190 U	180 U
Di-n-butylphthalate	62,000,000	9,200	200 U	200 U	180 U	190 U	190 U	180 U
Fluoranthene	22,000,000	160,000	200 U	200 U	180 U	79 J	910	180 U
Fluorene	22,000,000	27,000	200 U	200 U	180 U	190 U	190 U	180 U
Indeno(1,2,3-cd)pyrene	2,100	120	200 U	200 U	180 U	190 U	210	180 U
Naphthalene	18,000	0.47	200 U	200 U	180 U	190 U	190 U	180 U
Pentachlorophenol	9,000	5.7	390 U	390 U	340 U	370 U	380 U	350 U
Phenanthrene	-	-	200 U	200 U	180 U	190 U	760	180 U
Pyrene	29,000,000	4,200,000	200 U	82 J	180 U	110 J	1000	180 U

B Blank Contamination  
 J The associated numerical value is an estimated quantity because quality control criteria were not met. Presence of the analyte is reliable.  
 D Indicates that a dilution was performed  
 U The analyte was not detected above the Contract-Required Quantitation Limit.  
 E Concentration of analyte exceeded the calibration range of the instrument  
**BOLD** Analyte detected  
 \* Result above the EPA Regional Screening Level  
 \*\* Reporting Limit is ≥ the Regional Screening Level

**TABLE 3**  
**Soil Pesticides and PCBs Sample Results**  
Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])

Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels – Migration to Groundwater	EFSO0001 H2RP8	EFSO0002 H2RP9	EFSO0003 H2RQ0	EFSO0004 H2RQ1	EFSO0005 H2RQ2	EFSO0006 H2RQ3	EFSO0007 H2RQ4	EFSO0008 H2RQ5	EFSO0009 H2RQ6	EFSO00010 H2RQ7	EFSO00011 H2RQ8	EFSO00012 H2RQ9
Analyte														
<b>Pesticides</b>														
4,4'-DDE	5,100	47	6.3	12	3.6 U	3.5 U	3.7 U	0.65 J	1 J	0.97 J	9.2	3.8 U	3.6 U	1.6 J
4,4'-DDT	7,000	67	4	8.1	3.6 U	3.5 U	3.7 U	4.4 U	3.6 U	3.7 U	0.9 J	3.8 U	3.6 U	3.9 U
Aldrin	100	0.65	2 U	2.1 U	1.9 U	1.8 U	1.9 U	2.3 U	1.8 U	1.9 U	1.9 U	2 U	1.9 U	2 U
alpha-Chlordane	6,500	13	2 U	2.1 U	1.9 U	1.8 U	1.9 U	2.3 U	1.8 U	1.9 U	1.9 U	2 U	1.9 U	2 U
Dieldrin	110	0.17	3.8 U	1.2 J	3.6 U	3.5 U	3.7 U	4.4 U	3.6 U	3.7 U	3.7 U	3.8 U	3.6 U	3.9 U
Endrin aldehyde	-	-	3.8 U	4 U	3.6 U	3.5 U	3.7 U	4.4 U	3.6 U	3.7 U	3.7 U	3.8 U	3.6 U	3.9 U
gamma-Chlordane	6,500	13	1.1 J	1.6 J	1.9 U	1.8 U	1.9 U	2.3 U	1.8 U	1.9 U	1.9 U	2 U	1.9 U	2 U
Heptachlor	380	1.2	2 U	2.1 U	1.9 U	1.8 U	1.9 U	2.3 U	1.8 U	1.9 U	1.9 U	2 U	1.9 U	2 U
Heptachlor epoxide	190	0.15	2 U	2.1 U	1.9 U	1.8 U	1.9 U	2.3 U	1.8 U	1.9 U	1.9 U	2 U	1.9 U	2 U
<b>PCBs</b>														
Aroclor-1248	740	5.2	38 U	40 U	36 U	35 U	37 U	45 U	36 U	37 U	37 U	38 U	130	39 U
Aroclor-1254	740	8.8	38 U	40 U	36 U	35 U	37 U	45 U	36 U	37 U	37 U	38 U	220	39 U

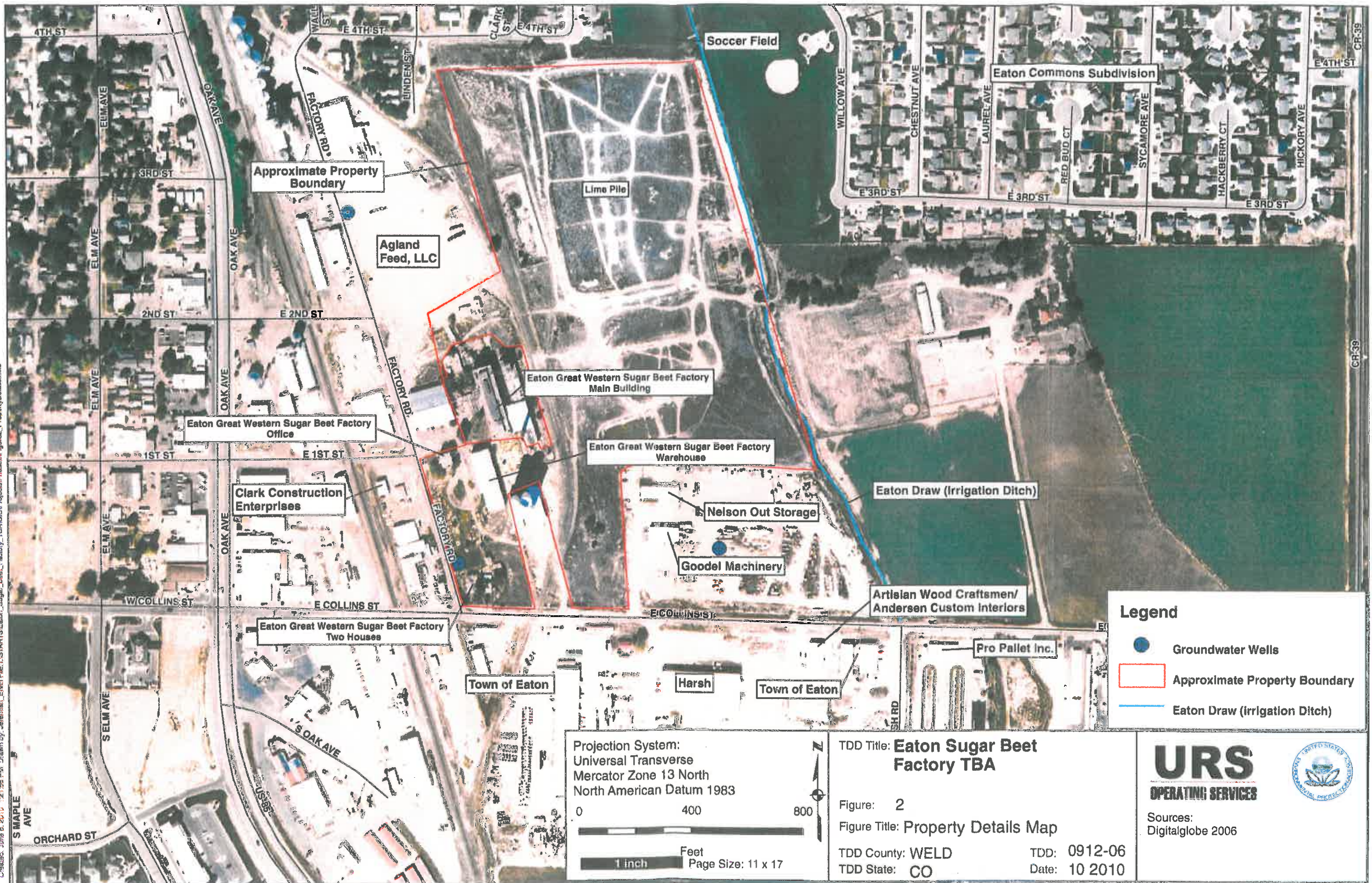


**TABLE 3 (cont.)**  
**Soil Pesticides and PCBs Sample Results**  
**Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])**

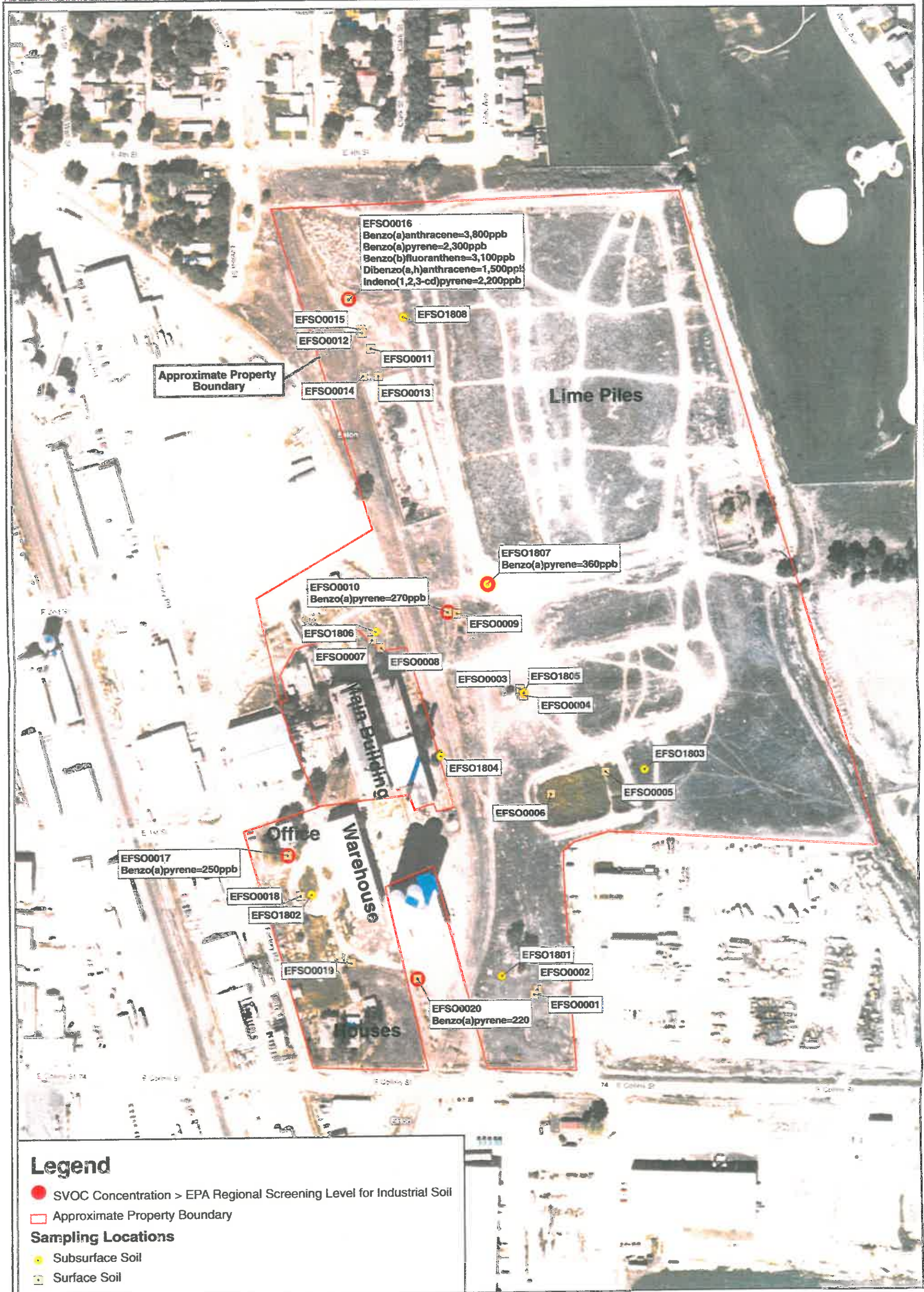
Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels – Migration to Groundwater	EFSO0013 H2RR0	EFSO0014 H2RR1	EFSO0015 H2RR2	EFSO0016 H2RR3	EFSO0017 H2RR4	EFSO0018 H2RR5	EFSO0019 H2RR6	EFSO0020 H2RR7	EFSOD0001 H2RR8	EFSO1801 H2RR9	EFSO1802 H2RS0
Analyte													
<b>Pesticides</b>													
4,4'-DDE	7,000	54,000	10	17	5.2	7.5	30	0.31 J	14	2.6 J	3.5 J	3.8 U	5.8
4,4'-DDT	7,000	32,000	1.1 J	4.5	3.7 U	1.3 J	2.8 J	3.8 U	5.3	3.8 U	1.4 J	3.8 U	2.2 J
Aldrin	100	500	2.1 U	1.8 U	1.9 U	1.9 U	0.93 J	2 U	3.8	2 U	2 U	1.9 U	2 U
alpha-Chlordane	6,500	10,000	2.1 U	1.8 U	1.9 U	1.9 U	3.3	2 U	1.9 U	2 U	2 U	1.9 U	2 U
Dieldrin	110	4	4 U	3.5 U	3.7 U	3.6 U	3.8 U	3.8 U	3 J	3.8 U	3.9 U	3.8 U	3.9 U
Endrin aldehyde	-	-	4 U	3.5 U	3.7 U	3.6 U	1.5 J	3.8 U	3.6 U	3.8 U	3.9 U	3.8 U	3.9 U
gamma-Chlordane	6,500	10,000	2.1 U	1.8 U	1.9 U	1.9 U	1.9 U	2 U	1.9 U	2 U	2 U	1.9 U	2 U
Heptachlor	380	23,000	2.1 U	1.8 U	1.9 U	1.9 U	1.9 U	2 U	1.1 J	2 U	2 U	1.9 U	2 U
Heptachlor epoxide	190	700	2.1 U	1.8 U	1.9 U	1.9 U	1.9 U	2 U	3.9	2 U	2 U	1.9 U	2 U
<b>PCBs</b>													
Aroclor-1248	740	3	39 U	35 U	23 J	36 U	38 U	39 U	36 U	38 U	38 U	38 U	39 U
Aroclor-1254	740	5.1	39 U	35 U	51	36 U	38 U	39 U	36 U	38 U	38 U	38 U	39 U



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Projection System:  
Universal Transverse  
Mercator Zone 13 North  
North American Datum 1983

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Sources: Airphoto USA, 2006-09-01  
HSIP Gold v2 2007



TDD Title: **EATON SUGAR BEET FACTORY**

TDD County: WELD

TDD State: CO

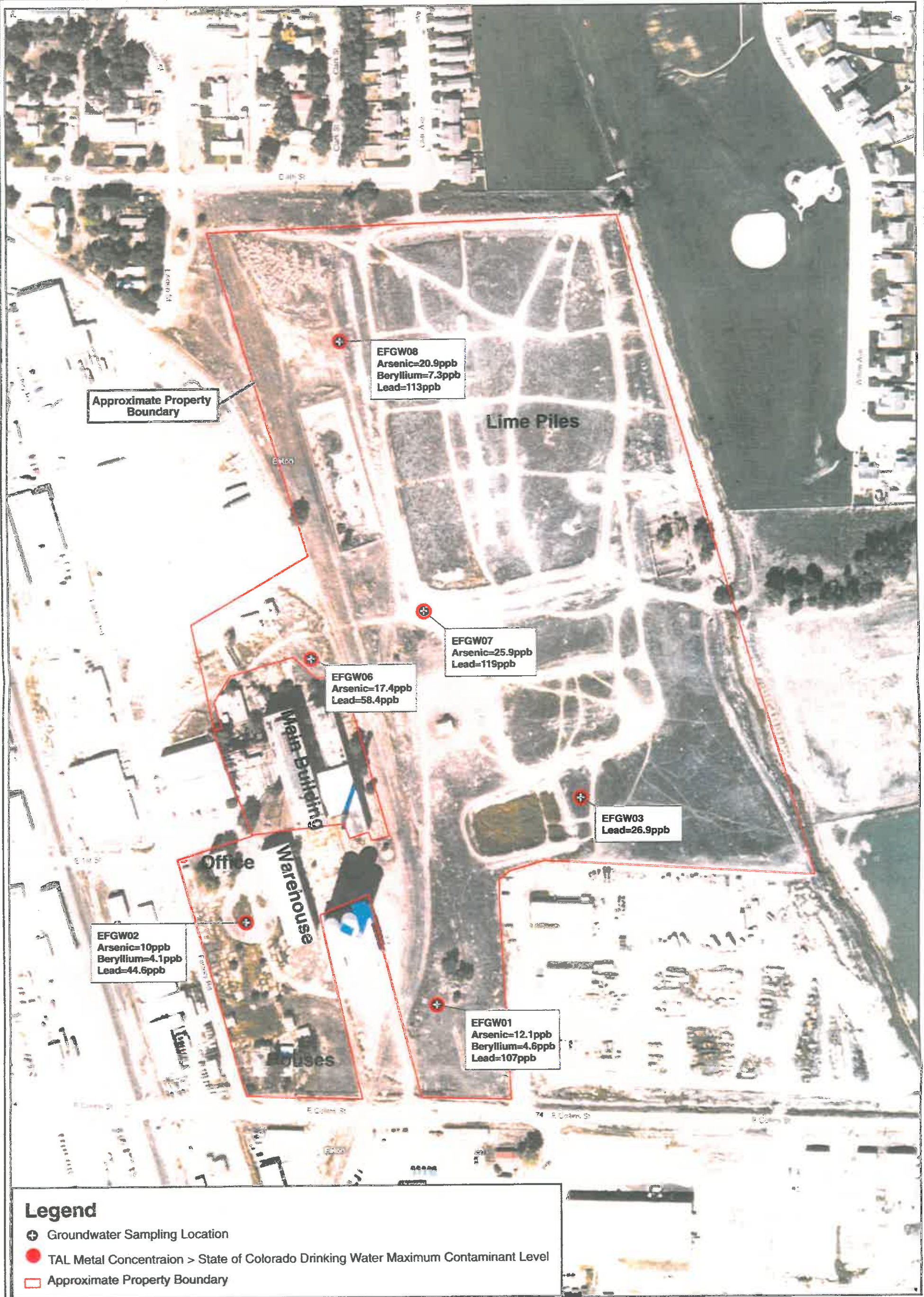
Figure No.  
**3**

TDD: 0912-06

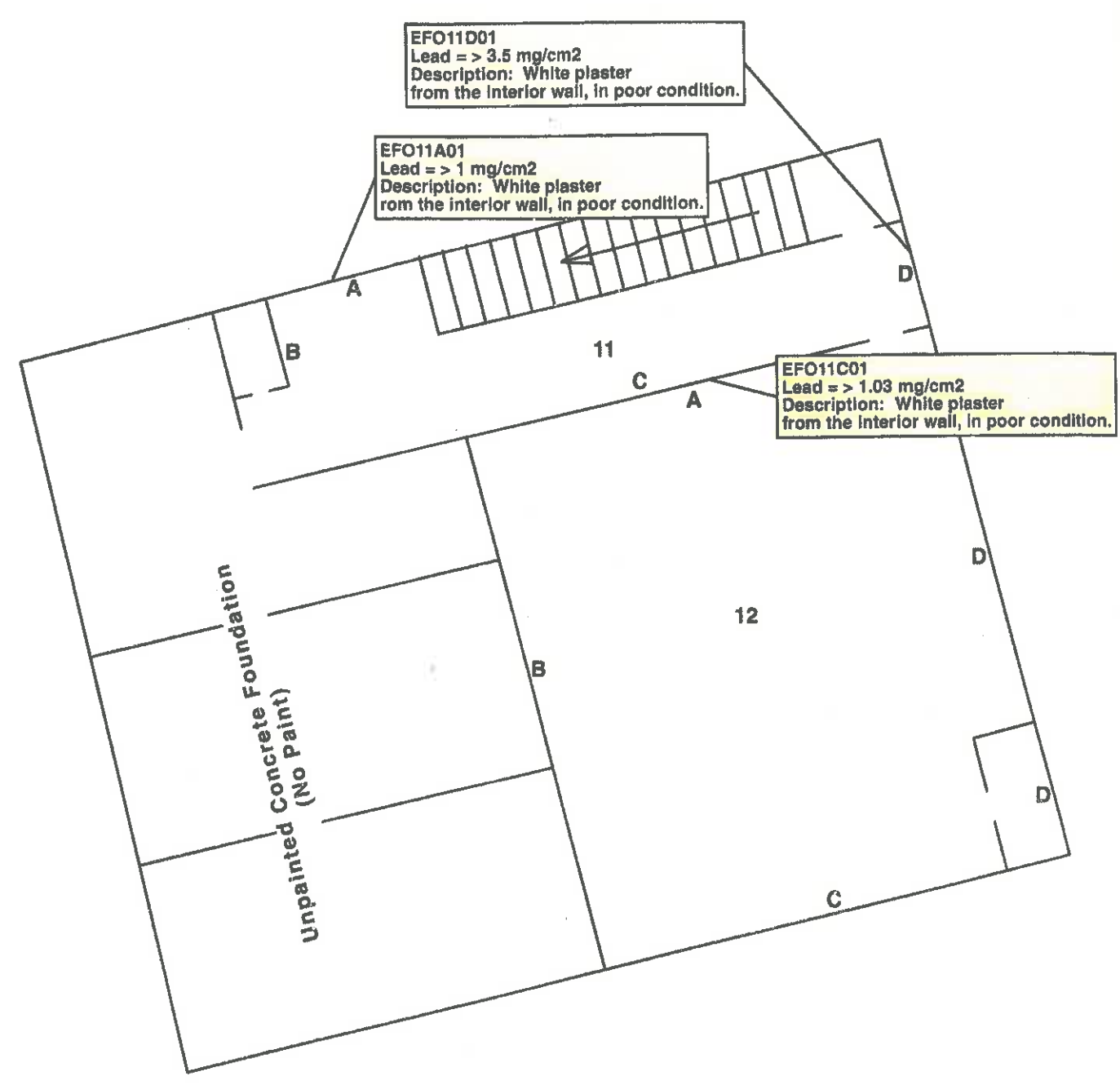
Date: 10 2010

Figure Title:  
**Soil Semi-Volatile Organic  
Compound Results**

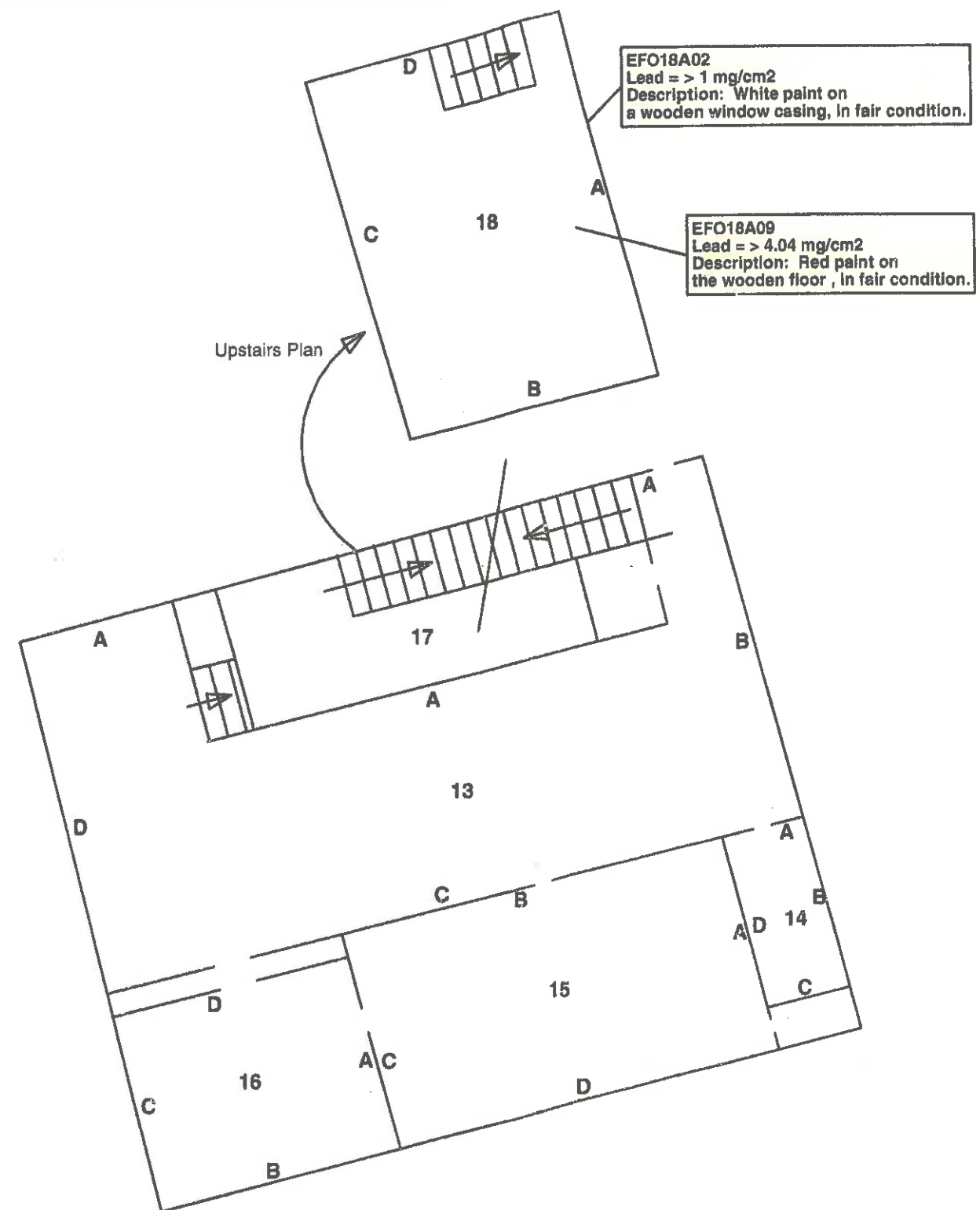








Office - Basement Plan



Office - First Floor and Upstairs Plan

Note: Site Features are not to scale.



Projection System:  
Universal Transverse  
Mercator Zone 13 North  
North American Datum 1983

**URS**  
OPERATING SERVICES

Sources: START 2010



TRD Title: **Eaton Sugar  
Beet Factory**

TRD County: WELD TRD: 0912-06

TRD State: CO Date: 10 2010

Figure No: 6 Figure Title:  
Office Lead-Based-  
Paint Results







**TABLE 1**  
**Sample Locations and Rationale**

Sample Matrix	Sample ID	Location	Rationale
Construction Building Material	EF##XX##	Determined on location (Building Structures.)	Characterize, quantify, and determine to what extent ACM is present in the buildings on the property.
Groundwater	EFGW##	Determined on location.	Determine if the groundwater on the property is contaminated with pesticides, SVOCs, VOCs, or metals.
Groundwater Duplicate	EFGWD##	Duplicate groundwater sample.	Document the precision of sample collection procedures and laboratory analyses.
Surface Soil	EFSO00##	Determined on location.	Determine if the surface soil on the property is contaminated with pesticides, SVOCs, VOCs, or metals.
Surface Soil Replicate	EFSOD00##	Replicate surface soil sample.	Document the precision of sample collection procedures and laboratory analyses.
Surface Soil	EFSO#####	See Figure 3.	Determine the extent of surface soil on the property that is contaminated with ACS.
Surface Soil Replicate	EFSO#####	Replicate surface soil sample.	Document the precision of sample collection procedures and laboratory analyses.
Subsurface Soil	EFSO18##	Determined on location.	Determine if the subsurface soil on the property is contaminated with pesticides, SVOCs, VOCs, or metals.
Subsurface Soil Replicate	EFSOD18##	Replicate subsurface soil sample.	Document the precision of sample collection procedures and laboratory analyses.
Paint Chip	EF####X#	Determined on location from building structures on property.	Determine if LBP is present in the buildings on the property and to what extent.
Water	EFSORINS18##	Rinsate blank.	Document thoroughness of the decontamination procedure.
Groundwater	EFTB##	Trip blank (VOC analyses only).	Document potential for contamination via transport.
Container Waste	EFHC##	Determined on location.	Characterize unknown wastes at the ESBF property for disposal.

**TABLE 2**  
**Soil Volatiles and Semi-Volatiles Sample Results**  
**Concentrations in micrograms per kilogram (µg/kg) (parts per billion [ppb])**

Sample ID#: Lab Sample ID: Location:	EPA Regional Screening Level for Industrial Soil	EPA Soil Screening Levels - Migration to Groundwater	EFSO0001 H2RP8	EFSO0002 H2RP9	EFSO0003 H2RQ0	EFSO0004 H2RQ1	EFSO0005 H2RQ2	EFSO0006 H2RQ3	EFSO0007 H2RQ4	EFSO0008 H2RQ5	EFSO0009 H2RQ6	EFSO00010 H2RQ7	EFSO00011 H2RQ8	EFSO00012 H2RQ9
<b>Analyte</b>														
<b>Volatiles</b>														
Acetone	61,000,000	4,500	12 U	12 U	11 U	11 U	11 U	14 U	10 U	11 U	11 U	11 U	11 U	12 U
Chloroform	1,500	0.053	5.8 U	6 U	5.5 U	5.4 U	5.7 U	6.8 U	5.2 U	5.6 U	5.5 U	5.6 U	5.6 U	5.9 U
Methyl acetate	1,000,000,000	7,500	5.8 U	6 U	5.5 U	5.4 U	5.7 U	22	5.2 U	3.8 J	2.9 J	2.8 J	5.6 U	5.9 U
Methylene chloride	53,000	1.2	18 B	14 B	9.1 B	7.9 B	5.1 JB	8.8	3.7 J	5 J	5.5 U	7.9	5.6 U	3.8 J
<b>Semi-Volatiles</b>														
2-Methylnaphthalene	4,100,000	750	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Acenaphthene	33,000,000	2200,000	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Acenaphthylene	-	-	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Anthracene	170,000,000	360,000	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	76 J	120 J	190 U	200 U
Benzo(a)anthracene	2,100	10	200 U	120 J	190 U	180 U	190 U	130 J	140 J	140 J	260	270	190 U	110 J
Benzo(a)pyrene	210	3.5	200 U	140 J	190 U	180 U	190 U	110 J	170 J	130 J	200	*270	190 U	200 U
Benzo(b)fluoranthene	2,100	35	200 U	110 J	190 U	180 U	190 U	230 U	160 J	190 U	190 U	200	190 U	98 J
Benzo(g,h,i)perylene	-	-	200 U	120 J	190 U	180 U	190 U	120 J	150 J	160 J	230	200 U	190 U	81 J
Benzo(k)fluoranthene	21,000	350	200 U	110 J	190 U	180 U	190 U	91 J	150 J	180 J	260	210	190 U	93 J
Bis(2-ethylhexyl)phthalate	120,000	1,100	200 U	210 U	190 U	180 U	190 U	97 J	180 U	190 U	190 U	200 U	190 U	200 U
Carbazole	-	-	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Chrysene	210,000	1,100	200 U	160 J	190 U	180 U	190 U	180 J	180 J	190	350	340	190 U	120 J
Dibenzo(a,h)anthracene	210	11	200 U	**210 U	190 U	180 U	190 U	**230 U	180 U	190 U	190 U	200 U	190 U	200 U
Dibenzofuran	1,000,000	680	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Di-n-butylphthalate	62,000,000	9,200	200 U	210 U	190 U	82 J	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Fluoranthene	22,000,000	160,000	130 J	280	190 U	180 U	190 U	250	300	280	530	580	190 U	250
Fluorene	22,000,000	27,000	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Indeno(1,2,3-cd)pyrene	2,100	120	200 U	88 J	190 U	180 U	190 U	230 U	120 J	190 U	190 U	200 U	190 U	85 J
Naphthalene	18,000	0.47	200 U	210 U	190 U	180 U	190 U	230 U	180 U	190 U	190 U	200 U	190 U	200 U
Pentachlorophenol	9,000	5.7	380 U	400 U	360 U	350 U	370 U	440 U	360 U	370 U	240 J	380 U	370 U	390 U
Phenanthrene	-	-	200 U	150 J	190 U	180 U	190 U	230 U	220	180 J	250	420	190 U	170 J
Pyrene	29,000,000	4,200,000	97 J	220	190 U	180 U	190 U	230 U	380	230	390	470	190 U	200 J



**TABLE 10**  
**Preliminary Cost Estimate for Disposal of Containers**

<b>COST ESTIMATE SCENARIO 1</b>		
<b>I. Treatment &amp; Disposal</b>		<b>Total Cost</b>
Containers: EBHZ01, EBHZ02, EBHZ03, EBHZ04, EBHZ05, EBHZ06 for Incineration	6 x \$264.00 DM55	\$1,584.00
Container: EBHZ08 for Waste Water Treatment	1x \$130.00 DF55	\$130.00
Container: EBHZ07 for Waste Water Treatment	1x \$50.00 DF05	\$50.00
Containers: EBHZ09, EBHZ18, EBHZ21, EBHZ22, EBHZ23 Lab Pack for Fuels Blending	1 x \$175.00 CF55	\$175.00
Containers: EBHZ10, EBHZ11, EBHZ12, EBHZ13, EBHZ16, EBHZ17, EBHZ20 for Incineration (180lbs minimum)	2275 x \$0.60 Lb.	\$1,365.00
Containers: EBHZ14, EBIZ19, Factory Sealed Drum 01 for Incineration	3x \$264.00 DM55	\$792.00
Container: EBHZ15 for Treatment	1 x \$219.00 DM55	\$219.00
Containers: EBHZ24, EBHZ25s' Lab Pack for Incineration	1 x \$285.00 CF55	\$285.00
Fuel Oil for Fuels Blending ->5000BTUllbs, <1/3rd container sludge, <5% halogens	32 x \$60.00 DM55	\$1,920.00
Liquid Perchlorate for Treatment	1 x \$517.00/ OM55	\$517.00
<b>II. Materials &amp; Supplies</b>		
Labpacker, (55 gallon)	2x \$30.00 Each	\$60.00
Absorbent Bags, (Vermiculite)	2x \$19.00 Each	\$38.00
Drum, Metal, (85 gallon. overpack), New, Open Top (if needed)	50 x \$157.50 Each	\$7,875.00
<b>III. Labor</b>		
Environmental Technician, Straight Time, hourly rate	3x \$55.00 Hour	\$165.00
<b>IV. Transportation</b>		
Transportation	19 x \$35.00 Each	\$665.00
<b>V. Profile Administration</b>		
Energy & Insurance Fee	8076 x \$0.10/ %	\$807.60
Handling, (Overpack handling fee, if needed)	50x \$72.00 Each	\$3,600.00
<b>VI. Total Estimate</b>		
		<b>\$20,247.60</b>

Note: DISPOSAL PRICE is based upon disposal method; therefore, the disposal price estimated above may differ from the final disposal price, which will be determined upon profiling and/or upon waste verification at time of waste receipt. All pricing is based on straight time.

**TABLE 10, continued**  
**Purpose: Preliminary Cost Estimate for Disposal of Containers**

<b>COST ESTIMATE SCENARIO 2</b>		
<b>I. Treatment &amp; Disposal</b>		<b>Total Cost</b>
Containers: EBHZ01, EBHZ02, EBHZ03, EBHZ04, EBHZ05, EBHZ06 for Incineration	6 x \$264.00 DM55	\$1,584.00
Container: EBHZ07 for Incineration	1 x \$135.00 DM05	\$135.00
Container: EBHZ08 for Incineration	1 x \$480.00 DM55	\$480.00
Containers: EBHZ09, EBHZ18, EBHZ21, EBHZ22, EBHZ23 Lab Pack for Fuels Blending	1 x \$175.00 CF55	\$175.00
Containers: EBHZ10, EBHZ11, EBHZ12, EBHZ13, EBHZ16, EBHZ17, EBHZ20 for Incineration (1801bs minimum)	2275 x \$0.60 Lb.	\$1,365.00
Containers: EBHZ14, EBIZ19, Factory Sealed Drum 01 for Incineration	3x \$264.00 DM55	\$792.00
Container: EBHZ15 for Treatment	1 x \$219.00 DM55	\$219.00
Containers: EBHZ24, EBHZ2s' Lab Pack for Incineration	1 x \$285.00 CF55	\$285.00
Fuel Oil for incineration ->5000BTU/lbs, <1/3rd container sludge, >5% halogens	32 x \$264.00 DM55	\$8,448.00
Liquid Perchlorate for Treatment	1 x \$517.00/ OM55	\$517.00
<b>II. Materials &amp; Supplies</b>		
Labpacker, (55 gallon)	2x \$30.00 Each	\$60.00
Absorbent Bags, (Vermiculite)	2x \$19.00 Each	\$38.00
Drum, Metal, (85 gallon. overpack), New, Open Top (if needed)	50x \$157.50 Each	\$7,875.00
<b>III. Labor</b>		
Environmental Technician, Straight Time, hourly rate	3x \$55.00 Hour	\$165.00
<b>IV. Transportation</b>		
Transportation	19 x \$35.00 Each	\$665.00
<b>V. Profile Administration</b>		
Energy & Insurance Fee	8076 x \$0.10/ %	\$807.60
Handling, (Overpack handling fee, if needed)	50x \$72.00 Each	\$3,600.00
<b>VI. Total Estimate</b>		
		<b>\$27,210.60</b>

Note: DISPOSAL PRICE is based upon disposal method; therefore, the disposal price estimated above may differ from the final disposal price, which will be determined upon profiling and/or upon waste verification at time of waste receipt. All pricing is based on straight time.

**TABLE 11**  
**Purpose: Preliminary Cost Estimate for Asbestos Abatement**

Task Type	Unit	Task code	Qty	Price	Costs	Notes
Pre-cleaning/Non-Asbestos Debris Removal	sf	02 82 13.42 0100	84,055	0.4	\$33,622	
Containment, each layer, 6 mil	sf	02 82 13.42 0560	4,400	0.82	\$3,608	
Decon and staging area, 1000 sq ft	sf	02 82 13 42 0400	1,000	6.95	\$6,950	
Neg Air Machine and Setup	ea	02 82 13 42 0900/ 6500	24	1022	\$24,528	
Removal, pipe insulation	lf	02 82 13 43 1100	2,673	15.6	\$41,699	
Removal, Boiler	sf	02 82 13 43 0200	8,718	9.95	\$86,744	
Removal, Cementitious Flat Materials	sf	02 82 13 42 3000	1,800	2.64	\$4,752	
Removal, Collect Bulk Debris - Friable	3 cf	02 82 13 47 0100	13,560	13.85	\$187,806	
Removal, VAT	sf	02 82 13 42 5000	6,202	1.98	\$12,280	
Removal, Cement Asbestos Transite Board	sf	02 82 13 43 8000	5,985	1.28	\$7,661	
6" scrape of soil from ACM areas	cy	31 23 16 13 0050	5,697	8.65	\$49,279	
Removal, Bulk Debris and Soil from Property	cy	31 23 16 42 0200	5,000	2.28	\$11,400	
Removal, Asbestos Millboard	sf	02 82 13 43 8300	900	1.22	\$1,098	
Removal, Irregular Sprayed surface insulation	sf	02 82 13 43 3100	18	3.96	\$71	
Removal, Shingle Roofing	sf	02 82 13 43 8200	26,948	1.23	\$33,146	
Removal, Ducts	sf	02 82 13 43 0400	4,500	5.4	\$24,300	
Removal, Cleaning of existing equipment prior to disposal	sf	02 82 13 42 0100	223,200	0.4	\$89,280	
Testing, Cleaned area,	ea	02 82 13 45 1110	200	146	\$29,200	
Testing, Personnel, 100 days, 10 samples per day	ea	02 82 13 45 0200	1000	13	\$13,000	
Testing, Area, 100 days, 10 samples per day	ea	02 82 13 45 1100	1,000	13	\$13,000	

**TABLE 11, continued**  
**Purpose: Preliminary Cost Estimate for Asbestos Abatement**

Task Type	Unit	Task code	Qty	Price	Costs	Notes
Load out	ea (3 cf)	02 82 13.47 0100	13000	13.85	\$180,050	
Disposal	cy	02 82 13.47 5000	13000	121	\$1,573,000	
<b>Job subtotal</b>					<b>\$2,426,474</b>	
Contingency	job		1	0.2	\$485,295	This is a percentage of the total job.
Permitting	job	01 41 26.50 0100		0.02	\$48,529	This is a percentage of the total job.
<b>Total Estimated Costs</b>					<b>\$2,960,298</b>	

Estimate does not include mobilization/demobilization costs, as these costs are dependant upon contractor-specific distances to the site, and amount of crew per unit equipment and task.

Estimate does not include administration and contractor reporting.

Assumes a bulk debris depth of 6 in.

Average pipe diameters of 8" (0.67 ft) used to calculate volume of pipe.

Cost estimate does not include standard oversight contractor costs.

**TABLE 12**  
**Preliminary Cost Estimate for Lead-Based Paint Abatement**

Task type	Unit	Task code	Qty	Price	Costs	Notes
Mobilization, equip towed by pickup	ea	01 54 36.50 1100	3	\$70.00	\$210	
Encapsulation on walls	sq ft	02 83 19.23 0220	800	\$1.35	\$1,080.00	
Removal, by chemicals on windows	ea	02 83 19.26 6280	10	\$272.00	\$2,720	
Removal, by chemicals on floors*	sq ft	02 83 19.26 4800	500	\$6.10	\$3,050	
55 gallon drum to contain waste	ea		2	\$75.00	\$150	
TCLP test on paint waste	ea		2	\$200.00	\$400	
Disposal, 55 gallon drum	ea		2	\$569.50	\$1,139	hazardous waste code D008
Demobilization	ea	01 54 36.50 1100	3	\$70.00	\$210	
Permitting	job	01 41 26.50 0100		0.01	\$375	
Total					\$9,334	
Contingency			20%		\$1,866.80	
Total Estimated Costs including contingency					\$11,200.80	

\* \* used cost estimate for siding – RSMeans does not provide costs for floors.  
 ea each  
 sq ft square feet

**TABLE 13**  
**Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail**

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
<b>Building 1</b>							
EF01CB101	Ceiling board in south room in basement	Millboard		12	Basement	ND	0
EF01FP102	Fireproofing textile north wall of the boiler room in basement	Irregular Surface	5 sq ft		Basement	ND	NA
EF01FP103	Fireproofing textile north wall of the boiler room in basement	Irregular Surface	5 sq ft	11	Basement	ND	NA
EF01PL106	Wall plaster from basement wall at bottom of stairs	Collect Bulk Debris			Basement	ND	NA
EF01WB102	Suspect transite on boiler room in basement north wall	Transite		10	Basement	ND	NA
EF01WI101	Textile under insulation on windows in basement	Collect Bulk Debris		13	Basement	ND	0
EF01FP101	Fireproofing textile north wall of the boiler room in basement	Irregular Surface	5 sq ft		Basement	Chrysotile	80
EF01PL107	Ceiling plaster from hallway in basement	Cementitious Flat			Basement	ND	NA
EF01WB101	Suspect transite on boiler room in basement south wall	Transite	288 sq ft		Basement	Chrysotile	17
EF01PL101	Plaster Chip on floor of main room east wall – Ceiling	Cementitious Flat		5	Main Floor	ND	0
EF01FT101	9"x9" white/Red floor tile with black mastic	VAT	100 sq ft	1	Main Floor Doorway	Chrysotile	10
EF01FT102	9"x9" white/Red floor tile with black mastic	VAT	"	2	Main Floor Doorway	ND	NA
EF01CT101	Ceiling tile in southwest corner room on main floor	Millboard	234 sq ft	15	Main Floor	ND	0
EF01CT201	Ceiling tile in south room on main floor	Millboard	306 sq ft	16	Main Floor	ND	0
EF01CT301	Ceiling tile in center room on main floor	Millboard	700 sq ft	17	Main Floor	ND	0
EF01DW101	Drywall composite on main floor	Collect Bulk Debris		6	Main Floor	ND	0
EF01DW102	East wall of bathroom on main floor	Millboard			Main Floor	ND	0
EF01DW103	South wall of main floor middle room	Millboard			Main Floor	ND	0
EF01PL104	Plaster from small office in east side main floor, ceiling	Cementitious Flat			Main Floor	ND	NA
EF01TP101	Tar paper under the red tile – better layer	VAT		4	Main Floor	ND	0
EF01TP102	Under Red Floor Tile	VAT			Main Floor	ND	0
EF01TP103	Tar paper under the red tile – better layer	VAT	"		Main Floor	ND	0
EF01WB202	Suspect transite over windows on main floor	Transite			Main Floor	ND	NA
EF01WB203	Suspect transite over windows on main floor	Transite			Main Floor	ND	NA
EF01WB103	Suspect transite on boiler room in basement Northwest wall	Transite			Main Floor	ND	NA
EF01WB201	Suspect wallboard transite above windows on main floor	Transite		14	Main Floor	Chrysotile	17
EF01DI101	Duct insulation on north wall duct on second floor	Duct	500 sq ft		Second Floor	Chrysotile	90
EF01DI102	Duct insulation on west wall duct on second floor	Duct	500 sq ft		Second Floor	ND	NA
EF01DI103	Duct insulation on north wall stairwell to second floor	Duct	500 sq ft	8	Second Floor	ND	NA
EF01FT301	Floor tile on second floor, east side, bathroom dark gray green	VAT	80 sq ft	9	Second Floor	ND	0
EF01PL105	Ceiling plaster, stairwell to second floor	Collect Bulk Debris			Second Floor	ND	NA
EF01PL103	Plaster chip from ceiling in stairwell to basement	Cementitious Flat	3000 sq ft		Stairwell	Chrysotile	2
EF01PL102	Stairwell to basement	Collect Bulk Debris			Stairwell	ND	0
EF01FT201	12"x12" gray with white streaked floor tile	VAT	150 sq ft	3	Under the red floor tile	ND	ND
EF01FT103	Red Floor tile	VAT	150 sq ft		Under tiles on wood flooring	ND	NA
EF01PL201	Second floor	Collect Bulk Debris	40 sq ft		Second Floor	ND	0
EF01PL202	Second floor	Collect Bulk Debris	40 sq ft		Second Floor	ND	0

**TABLE 13, continued**  
**Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail**

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
<b>Outside Building 1</b>							
EF01PL301	Plaster	Shingle Roofing			Outside	ND	0
EF01RF101	Roofing Material	Shingle Roofing	533 sq ft		Outside	Chrysotile	2
EF01RF103	Roofing Material	Shingle Roofing	533 sq ft		Outside	ND	NA
EF01RF102	Roofing Material	Shingle Roofing	533 sq ft		Outside	ND	NA
<b>Building 2</b>							
<b>Outside</b>							
EF02FB101	Fireproofing on furnace on west side of drier building	Irregular Surface	3 sq ft	20	Outside	Chrysotile	12
EF02PI101	Suspect Magblock pipe insulation on piping in east side of the drier room	Pipe	6 ln ft	21	Outside	Amosite	15
EF02RM101	Northeast side of building, transite tile blown off roof	Shingle Roofing	15000 sq ft		Outside	Chrysotile	30
EF02RM102	ENE side of building along rail line, transite blown off roof	Shingle Roofing	"	22	Outside	ND	NA
EF02RM103	East side of building along rail line, transite blown off roof	Shingle Roofing	"		Outside	ND	NA
EF02RM104	East side of building along rail line, transite blown off roof	Shingle Roofing	"		Outside	ND	NA
EF02RM105	Southeast side of building, along rail line, transite tile blown off roof	Shingle Roofing	"		Outside	ND	NA
EF02RM106	Southwest side of building, transite blown off roof	Shingle Roofing	"		Outside	ND	NA
EF02RM107	West Site of building, transite tile blown off roof	Shingle Roofing	"		Outside	ND	NA
<b>Building 3</b>							
<b>First Floor</b>							
EF03ABI101	Mortar between fire brick in boiler	Boiler		100-0915	First Floor	Chrysotile	TR <0.25
EF03ABI102	Mortar between fire brick in boiler	Boiler		100-0915	First Floor	ND	0
EF03ABI103	Mortar between fire brick in boiler	Boiler		100-0915	First Floor	ND	0
EF03ABI201	Appears to have been insulation inside of boiler	Collect Bulk Debris		100-0916	First Floor	ND	0
EF03ABI202	Appears to have been insulation inside of boiler	Collect Bulk Debris		100-0916	First Floor	ND	0
EF03ABI203	Appears to have been insulation inside of boiler	Collect Bulk Debris		100-0916	First Floor	ND	0
EF03ABI401	Gasket around boiler openings and doors	Boiler	Up to 10, 14" diameter rings	100-0935	First Floor	Chrysotile	75
EF03ABI402	Gasket around boiler openings and doors	Boiler	"	100-0935	First Floor	ND	NA
EF03ABI403	Gasket around boiler openings and doors	Boiler	"	100-0935	First Floor	ND	NA
EF03ABI501	Insulation from interior of large white boiler – mortar around opening	Boiler		100-0934	First Floor	ND	0
EF03ABI502	Insulation from interior of large white boiler – mortar around opening	Boiler		100-0935	First Floor	ND	0
EF03ABI503	Insulation from interior of large white boiler – mortar around opening	Boiler		100-0935	First Floor	ND	0
EF03ACB101	Transite Board on ceiling and as debris in locker room area	Transite	5600 sq ft	100-0921	First Floor	Chrysotile	17
EF03ACB102	Transite Board on ceiling and as debris in locker room area	Transite	"	100-0922	First Floor	ND	NA
EF03ACB103	Transite Board on ceiling and as debris in locker room area	Transite	"	100-0922	First Floor	ND	NA
EF03ACT101	Ceiling Tile – Mostly as Debris on the floor	Millboard		100-0902	First Floor	ND	0
EF03ACT102	Ceiling Tile – Mostly as Debris on the floor	Millboard		100-0902	First Floor	ND	0
EF03ACT103	Ceiling Tile – Mostly as Debris on the floor	Millboard		100-0902	First Floor	ND	0
EF03ADB101	Pipe Material – debris on floor throughout SW corner of building	Collect Bulk Debris		100-0892	First Floor	Amosite	20
EF03ADB102	Pipe Material – debris on floor throughout SW corner of building	Collect Bulk Debris		100-0892	First Floor	Chrysotile	6



**TABLE 13, continued**  
**Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail**

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
EF03ADB103	Pipe Insulation as debris on floor – including 14 ft of Magblock pipe wrapping	Collect Bulk Debris		100-0892	First Floor	Amosite	6
EF03ADI101	Insulation from duct work attached to boiler/large white equipment	Duct		100-0912	First Floor	Chrysotile	40
EF03ADI102	Insulation from duct work attached to boiler/large white equipment	Duct		100-0910	First Floor	ND	NA
EF03ADI103	Insulation from duct work attached to boiler/large white equipment	Duct		100-0910	First Floor	ND	NA
EF03AEI101	Insulation from large white piece of equipment	Boiler	6000 sq ft	100-0911	First Floor	Chrysotile	15
EF03AEI102	Insulation from large white piece of equipment	Boiler	"	100-0910	First Floor	ND	NA
EF03AEI103	Insulation from large white piece of equipment	Boiler	"	100-0910	First Floor	ND	NA
EF03AGK101	Gasket material in a pile on the floor	Collect Bulk Debris	20 gaskets – 6-10" in diameter	100-0914	First Floor	Chrysotile	70
EF03API102	4" diameter Magblock pipe insulation	Pipe	70 ln ft	100-0896	First Floor	ND	NA
EF03API103	4" diameter Magblock pipe insulation	Pipe			First Floor	ND	NA
EF03API201	8" diameter Magblock pipe insulation	Pipe	100 ln ft		First Floor	Chrysotile	20
EF03API202	8" diameter Magblock pipe insulation	Pipe			First Floor	ND	NA
EF03API301	4" diameter air cell type pipe insulation	Pipe	15 ln ft		First Floor	Chrysotile	75
EF03API302	4" diameter air cell type pipe insulation	Pipe	15 ln ft	100-0896	First Floor	Chrysotile	80
EF03API401	18" diameter Magblock pipe insulation	Boiler	60 sq ft	100-0899	First Floor	Amosite	20
EF03API402	18" diameter Magblock pipe insulation	Boiler	Part of EF03API401 – total sample length – 60 ft	100-0900	First Floor	ND	NA
EF03API403	18" diameter Magblock pipe insulation	Boiler	Part of EF03API401 – total sample length – 60 ft	100-0900	First Floor	ND	NA
EF03API501	4" diameter Magblock pipe insulation	Pipe	415 ln ft	100-0902	First Floor	Amosite	30
EF03API502	4" diameter Magblock pipe insulation	Pipe	"	100-0902	First Floor	ND	NA
EF03API503	4" diameter Magblock pipe insulation	Pipe	"	100-0902	First Floor	ND	NA
EF03API601	6" diameter Magblock pipe insulation	Pipe	555 ln ft	100-0903	First Floor	Amosite	20
EF03API602	6" diameter Magblock pipe insulation	Pipe	"	100-0903	First Floor	ND	NA
EF03API603	6" diameter Magblock pipe insulation	Pipe	"	100-0903	First Floor	ND	NA
EF03API701	1" diameter Magblock pipe insulation	Pipe	315 ln ft	100-0904	First Floor	Amosite	20
EF03API702	1" diameter Magblock pipe insulation	Pipe	"	100-0904	First Floor	ND	NA
EF03API703	1" diameter Magblock pipe insulation	Pipe		100-0904	First Floor	ND	NA
EF03ATI101	Tank insulation, white crumbly material	Boiler	9x4 Tank	100-0898	First Floor	Chrysotile	3
EF03ATI102	Tank insulation, white crumbly material	Boiler	9x4 Tank	100-0898	First Floor	ND	NA
EF03ATI103	Tank insulation, white crumbly material	Boiler	9x4 Tank	100-0898	First Floor	ND	NA
EF03ATI104	Debris, Including transite board piece	Collect Bulk Debris		100-0898	First Floor	ND	
EF03ATI201	Crumbly tank insulation on bulkhead of large white equipment	Boiler	2x4 diameter cap	100-0900	First Floor	Chrysotile	30
EF03ATI202	Crumbly tank insulation on bulkhead of large white equipment	Boiler			First Floor	ND	NA
EF03ATI203	Crumbly tank insulation on bulkhead of large white equipment	Boiler			First Floor	ND	NA
EF03ATI301	Tank insulation on tank in room with the large white equipment	Boiler	15'x5' diameter sq ft	100-0901	First Floor	Chrysotile	55
EF03ATI302	Tank insulation on tank in room with the large white equipment	Boiler	"	100-0901	First Floor	ND	NA
EF03ATI303	Tank insulation on tank in room with the large white equipment	Boiler	"	100-0901	First Floor	ND	NA



TABLE 13, continued  
Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
EF03ATI401	Vertical tank Southwest of large white square tank/equipment	Boiler	30'x10' sq ft	100-0905	First Floor	Chrysotile	40
EF03ATI402	Vertical tank Southwest of large white square tank/equipment	Boiler	"	100-0906	First Floor	ND	NA
EF03ATI403	Vertical tank Southwest of large white square tank/equipment	Boiler	"	100-0906	First Floor	ND	NA
EF03ATI501	Horizontal Tank West of large white square tank/equipment	Boiler	20'x15' sq ft	100-0908	First Floor	Chrysotile	25
EF03ATI502	Horizontal Tank West of large white square tank/equipment	Boiler	"	100-0909	First Floor	ND	NA
EF03ATI503	Horizontal Tank West of large white square tank/equipment	Boiler	"	100-0909	First Floor	ND	NA
EF03CPI301	4" diameter air cell type pipe insulation	Pipe	13 ln. ft	100-0895	First Floor	Amosite	8
EF03API101	4" diameter Magblock pipe insulation	Pipe	70 ln ft	100-0893	First Floor	Chrysotile	30
EF03API201	8" diameter Magblock pipe insulation	Pipe	201 ln ft	100-0894	First Floor	Chrysotile	30
EF03API303	Air cell type 4" diameter pipe insulation on pipe and as debris on the floor in locker room area	Pipe	15 ln ft		First Floor	Chrysotile	80
Building 3 Second Floor							
EF03BBI101	Insulation on 3 sectional boilers in Northwest Corner of second floor	Boiler	6'x3'x6' sq ft	100-0930	Second Floor	Chrysotile	35
EF03BBI102	Insulation on 3 sectional boilers in Northwest Corner of second floor	Boiler	6'x3'x6' sq ft	100-0930	Second Floor	ND	NA
EF03BBI103	Insulation on 3 sectional boilers in Northwest Corner of second floor	Boiler	6'x3'x6' sq ft	100-0930	Second Floor	ND	NA
EF03BCT101	White Textured 2'x4' ceiling tile as debris on flooring	Millboard	600 sq ft	100-0928	Second Floor	ND	0
EF03BCT102	White Textured 2'x4' ceiling tile as debris on flooring	Millboard	"	100-0928	Second Floor	ND	0
EF03BCT103	White Textured 2'x4' ceiling tile as debris on flooring	Millboard	"	100-0928	Second Floor	ND	0
EF03BDW101	Drywall, Mostly Painted blue – exists in walls and as debris on flooring	Collect Bulk Debris	2700 sq ft	100-0926	Second Floor	Chrysotile	6
EF03BDW102	Drywall, Mostly Painted blue – exists in walls and as debris on flooring	Collect Bulk Debris	"	100-0926	Second Floor	ND	NA
EF03BDW103	Drywall, Mostly Painted blue – exists in walls and as debris on flooring	Collect Bulk Debris	"	100-0926	Second Floor	ND	NA
EF03BFT101	9"x9" floor tile, black mastic (very broken up)	VAT	5000 sq ft	100-0924	Second Floor	Chrysotile	7
EF03BFT102	9"x9" floor tile, black mastic (very broken up)	VAT	"	100-0924	Second Floor	ND	NA
EF03BFT103	9"x9" floor tile, black mastic (very broken up)	VAT	"	100-0924	Second Floor	ND	NA
EF03BLN201	Sheet Linoleum flooring (brown with white pattern)	VAT	600 sq ft	100-0927	Second Floor	Chrysotile	35
EF03BLN202	Sheet Linoleum flooring (brown with white pattern)	VAT	"	100-0927	Second Floor	ND	NA
EF03BLN203	Sheet Linoleum flooring (brown with white pattern)	VAT	"	100-0927	Second Floor	ND	NA
EF03BPI101	1" Diameter pipe insulation – brown crumbly papery layers has metal covering over top	Pipe	12 ln ft	100-0923	Second Floor	Chrysotile	5
EF03BPI102	1" Diameter pipe insulation – brown crumbly papery layers has metal covering over top	Pipe	"	100-0923	Second Floor	ND	NA
EF03BPI103	1" Diameter pipe insulation – brown crumbly papery layers has metal covering over top	Pipe	"	100-0923	Second Floor	ND	NA
EF03BSF101	Sheet Linoleum flooring (green with white backing)	VAT	200 sq ft	100-0925	Second Floor	Chrysotile	40
EF03BSF102	Sheet Linoleum flooring (green with white backing)	VAT	"	100-0925	Second Floor	ND	NA
EF03BSF103	Sheet Linoleum flooring (green with white backing)	VAT	"	100-0925	Second Floor	ND	NA
EF03BTI101	Tank Insulation on the top of a tank located centrally on the East wall of the second floor	Boiler	5' diameter	100-0929	Second Floor	Chrysotile	75

**TABLE 13, continued**  
**Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail**

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
EF03BTI102	Tank Insulation on the top of a tank located centrally on the East wall of the second floor	Boiler	"	100-0929	Second Floor	ND	NA
EF03BTI103	Tank Insulation on the top of a tank located centrally on the East wall of the second floor	Boiler	"	100-0929	Second Floor	ND	NA
<b>Building 3 Third Floor</b>							
EF03CBI101 (COC labeled EF01CBI101)	Mineral fiber on boiler insulation west side	Boiler	180 sq ft	32	Third Floor	ND	0
EF03CBI102 (COC labeled EF01CBI102)	Boiler insulation from east side of 5 large boilers/ovens	Boiler	1920 sq ft		Third Floor	ND	0
EF03CDB101 (COC labeled EF01CDB101)	Debris sample near middle staircase and 36" diameter pipe	Collect Bulk Debris	150 sq ft	31	Third Floor	Chrysotile	7
EF03CDB201 (COC labeled EF01CDB201)	Debris Pile	Collect Bulk Debris	600 sq ft	34	Third Floor	Amosite	45
EF03CDB301 (COC labeled EF01CDB301)	Debris Pile	Collect Bulk Debris	50 sq ft	35	Third Floor	Amosite	12
EF03CDB401 (COC labeled EF01CDB401)	Debris Pile	Collect Bulk Debris	30 sq ft	36	Third Floor	Chrysotile	55
EF03CDB501 (COC labeled EF01CDB501)	Debris Pile between boilers/ovens B3 and B4	Collect Bulk Debris	90 sq ft	37	Third Floor	Amosite	4
EF03CDB601 (COC labeled EF01CDB601)	Debris Pile between boilers/ovens B2 and B3	Collect Bulk Debris	40 sq ft	38	Third Floor	Chrysotile	2
EF03CPI101	Suspect Magblock on 1" diameter line from large tanks in south section of third floor	Pipe	131 ln ft	29	Third Floor	Chrysotile	65
EF03CPI102	Suspect Magblock on 1" diameter line from large tanks in southwest section of third floor	Pipe	"		Third Floor	ND	NA
EF03CPI103	Suspect Magblock on 1" diameter line from large tanks in southeast section of third floor	Pipe	"		Third Floor	ND	NA
EF03CPI201	Suspect Magblock on 1" diameter line on west wall on third floor	Pipe	165 ln ft	30	Third Floor	Chrysotile	60
EF03CPI202	Suspect air cell on 1" diameter west wall on third floor	Pipe	100 ln ft		Third Floor	Chrysotile	15
EF03CPI301	Pipe Insulation around base of three turret-like structures, turret 1	Pipe	140 ln ft	33	Third Floor	Amosite	8
EF03CPI302	Pipe Insulation around base of three turret-like structures, turret 2	Pipe	"		Third Floor		35
EF03CPI303	Pipe Insulation around base of three turret-like structures, turret 3	Pipe	"		Third Floor	ND	NA
EF03DDB101	Sample from debris piles located immediately adjacent to tanks 1 – 4	Collect Bulk Debris	400 sq ft	26	Third Floor	Amosite	30
EF03DDB102	Sample from debris piles located immediately adjacent to tanks 1 – 4	Collect Bulk Debris	"	26	Third Floor	ND	NA
EF03DDB103	Sample from debris piles located immediately adjacent to tanks 1 – 4	Collect Bulk Debris	"	26	Third Floor	ND	NA

TABLE 13, continued  
Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
EF03DDB201	Brown fibrous plaster	Collect Bulk Debris			Third Floor	Chrysotile	35
EF03DDB202	Brown fibrous plaster	Collect Bulk Debris			Third Floor	ND	NA
EF03DDB203	Brown fibrous plaster	Collect Bulk Debris			Third Floor	ND	NA
EF03DTI201 (COC labeled EF01DTI201)	Suspect air-cell insulation on 6" diameter pipe	Pipe	150		Third Floor	Chrysotile	20
Building 3 Outside							
EF03ABI301	Mortar between bricks from boiler outside building to the Northeast of Main Entrance	Boiler	2500 sq ft	100-0919	Outside	ND	0
EF03ABI302	Mortar between bricks from boiler outside building to the Northeast of Main Entrance	Boiler	"	100-0919	Outside	ND	0
EF03ABI303	Mortar between bricks from boiler outside building to the Northeast of Main Entrance	Boiler	"	100-0919	Outside	ND	0
EF03DTI101 (COC labeled EF01DTI101)	Sample of black, lightweight, silica type of insulation from tank 3	Boiler	1885 sq ft	25	Roof	Chrysotile	65
EF03DTI102 (COC labeled EF01DTI102)	Sample of black, lightweight, silica type of insulation from tank 4	Boiler	"	25	Roof	ND	NA
EF03DTI103 (COC labeled EF01DTI103)	Sample of black, lightweight, silica type of insulation from tank 3	Boiler	"	25	Roof	ND	NA
EF03RBM101	Suspect transite On Roof by door entrance to roof, south side	Shingle Roofing	5800 sq ft		Roof	Chrysotile	50
EF03RBM102	Suspect transite On Roof by door entrance to roof, southeast side	Shingle Roofing	"		Roof	ND	NA
EF03RBM103	Suspect transite On Roof by door entrance to roof, east side	Shingle Roofing	"	23	Roof	ND	NA
EF03RPI101	Metal Jacketed Pipe insulation on east roof, 18" diameter suspect Magblock, 1'	Pipe	100 ln ft	23	Roof	Amosite	15
EF03RPI102	Metal Jacketed Pipe insulation on east roof, 18" diameter suspect Magblock, 1ndnd'	Pipe	"	23	Roof	ND	NA
EF03RPI103	Metal Jacketed Pipe insulation on east roof, 18" diameter suspect Magblock, 1ndnd'	Pipe	"	23	Roof	ND	NA
EF03RRM101	Roofing Material/tar on south side by entrance	Shingle Roofing	4500 sq ft	24	Roof	Chrysotile	4
EF03RRM102	Roofing Material/tar on east side by entrance	Shingle Roofing	"	24	Roof	ND	NA
EF03RRM103	Roofing Material/tar on west side by entrance	Shingle Roofing	"	24	Roof	ND	NA
Asbestos Surface Soil Samples Outside							
EF03SO1AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	8
EF03SO2AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	5
EF03SO3AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	25
EF03SO4AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	10
EF03SO5AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	8

TABLE 13, continued  
Eaton Sugar Beet Factory Buildings Asbestos-Containing Material Analytical Results and Sample Detail

Sample ID	Location Description	Description	Quantity Present	PhotoID	Sample Location	Mineral	Analytical Result
EFSO06AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	30
EFSO07AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	15
EFSO08AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	TR
EFSO09AB	Soil Sample outside of building	Soil			See Figure 4	Chrysotile	TR
EFSO10AB	Soil Sample outside of building	Soil			See Figure 4		ND
EFSO11AB	Soil Sample outside of building	Soil			See Figure 4		ND
EFSO12AB	Soil Sample outside of building	Soil			See Figure 4		ND

ln ft linear feet  
sq ft square feet  
NA Not applicable  
ND Not detected  
TR Trace

**TABLE 14**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAA1900	Soil	OPEN DIRT LOT; COMPOSITE SOIL SAMPLE COLLECTED	0	AA19	OPEN DIRT LOT; AGLAND HAS METAL AND EQUIPMENT STORED HERE	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAA2800	Soil	INTERMIXED WEEDS AND GRASS; COMPOSITE SOIL SAMPLE COLLECTED	0	AA28	IN FRONT YARD OF OFFICE	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAA2900	Soil	INTERMIXED WEEDS AND GRASS	0	AA29	IN FRONT AND SIDE YARD OF OFFICE	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED GRASSES AND WEEDS	0	AA30	INTERMIXED GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO					
EFAA31G01	Debris	ASPHALT SHINGLE GRAB SAMPLE COLLECTED	1	AA31	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
EFAB0100	Soil	CHICKEN WIRE BOX SPRING MINIMAL DEBRIS COMPOSITE SOIL SAMPLE COLLECTED	0	AB01	DUMPED TRASH AND WEEDS, WOODEN POSTS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAB18G01	Debris	HEAVY FIBROUS PAPER MATERIAL	2-10	AB18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAB1900	Soil	WINDOW CAULKING OFF OF SHED IS SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	>25	AB19	A SMALL SHED IN CENTER OF CELL WITH WOODEN PLATFORM & A OPEN DIRT LOT	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAB19G01	Debris	WHITE WINDOW CAULKING	>25	AB19	SHED AND WOOD PLATFORM OPEN DIRT LOT	INSPECTED, ACM LEFT	YES	YES	Chrysotile	3		NO	NA
EFAB2000	Soil	COMPOSITE SOIL SAMPLE COLLECTED ON BORDER OF AGLAND	0	AB20	LOADING DOCK AGLAND STORAGE AREA	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAB2100	Soil	COMPOSITE SOIL SAMPLE COLLECTED; NO VISUAL SUSPECT ACM	0	AB21	OPEN DIRT LOT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AB22	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AB23	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					



**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAB24G01	Debris	FIBERBOARD, SUSPECT ACM	2-10	AB24	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAB24G02	Debris	FIBROUS PAPER MATERIAL	2-10	AB24	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAB24G03	Debris	ASPHALT ROOFING MATERIAL	2-10	AB24	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	GRASS AND WEEDS ON THE NORTH AND EAST SIDES OF THE OFFICE; MIXED TRASH DEBRIS	0	AB28	3/4 OF CELL IS OFFICE; MIXED TRASH DEBRIS	INSPECTED, NO ACM	NO	YES					
EFAB29G01	Debris	ASPHALT ROOFING MATERIAL WITH SILVER METALLIC COATING, GRAB SAMPLE COLLECTED; SQUARE 60 PERCENT ASPHALT; TRANSITE SHINGLE PRESENT	>25	AB29	MINIMAL DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED GRASSES AND WEEDS	0	AB30	INTERMIXED GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	ASPHALT SHINGLE REMOVED	2	AB31	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	0	AB32	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	0	AB33	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	0	AB34	INTERMIXED GRASSES AND WEEDS ASPHALT/DIRT LOT	INSPECTED, NO ACM	NO	NO					
EFAC01G01	Debris	DUMP AREA, BLACK ROOFING TAR SHINGLES WITH SILVER PAINT	>25	AC01	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	60		NO	NA
EFAC01G02	Debris	FIBROUS WHITE PLASTER	>25	AC01	BRICKS, WOOD, AND CONCRETE DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AC02	BRICKS, WOOD, AND CONCRETE DEBRIS	INSPECTED, ACM LEFT	YES	YES					

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAC0300	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AC03	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAC0400	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AC04	WEEDS AND OLD SCRAP WOOD	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAC0500	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AC05	WEEDS NO DEBRIS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAC1700	Soil	CONCRETE BARRIER FILLED WITH SCRAP METAL BY A OPEN DIRT LOT; COMPOSITE SOIL SAMPLE COLLECTED	0	AC17	DIRT LOT	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AC18	CELL INSIDE FENCE; SUSPECT ACM PRESENT	INSPECTED, ACM LEFT	YES	YES					
EFAC1900	Soil	OVERGROWN WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AC19	NATURAL GRASSES AND WEEDS WITH MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAC2000	Soil	OVERGROWN WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AC20	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH DEBRIS INCLUDES SUGAR BEET TROTH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAC2100	Soil	CONCRETE FOUNDATION FOR SUGAR BEET TROTH; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AC21	HALF OF CELL INSIDE FENCE; CONCRETE FOUNDATION FOR SUGAR BEET TROTH; NORTH END OF ESBF MAIN BUILDING	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAC21G01	Debris	RUBBER HOSE WITH OUTER COATING GRAB SAMPLE COLLECTED; MIXED SUSPECT ACM DEBRIS	2-10	AC21	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AC22	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAC23G01	Debris	FIBROUS PAPER MATERIAL GRAB SAMPLE; MIXED SUSPECT ACM DEBRIS	2-10	AC23	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAC24G01	Debris	BELTING MATERIAL GRAB SAMPLE; MIXED SUSPECT ACM DEBRIS	2-10	AC24	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AC25	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAC26G01	Debris	BELTING MATERIAL GRAB SAMPLE; MIXED SUSPECT ACM DEBRIS	2-10	AC26	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAC27G01	Debris	FELT SAMPLE; MIXED SUSPECT ACM DEBRIS	>25	AC27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAC27G02	Debris	SHINGLE, WITH GREEN AND WHITE AGGREGATE; MIXED SUSPECT ACM DEBRIS	>25	AC27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAC27G03	Debris	TRANSITE SHINGLE	>25	AC27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	Chrysotile	10		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	ASPHALT PARKING LOT	0	AC28	ASPHALT PARKING LOT NO DEBRIS	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	ASPHALT PARKING LOT	0	AC29	ASPHALT PARKING LOT NO DEBRIS	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AC30	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO					
EFAC31G01	Debris	BIG PIECES OF TRANSITE REMOVED, SMALL PEA SIZED TRANSITE STILL IN CELL SHINGLE; GRAB SAMPLE COLLECTED	2-10	AC31	MINIMAL BRICK DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AC32	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AC33	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO					



TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAC3400	Soil	80 PERCENT ASPHALT; COMPOSITE SOIL SAMPLE COLLECTED	0	AC34	NO DEBRIS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAD01G01	Debris	DUMP AREA BLACK ROOFING SHINGLE WITH SILVER PAINT GRAB SAMPLE COLLECTED	>25	AD01	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	4		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD02	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD03	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD04	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
EFAD0500	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED; SUSPECT ACM REMOVED	3	AD05	NATURAL GRASSES AND WEEDS	INSPECTED, ACM REMOVED	NO	NO	NA		ND	NO	NA
EFAD0600	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AD06	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAD0700	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AD07	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAD0800	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AD08	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT LOT; CELL PRIMARILY AGLAND	0	AD16	DIRT LOT	INSPECTED, NO ACM	NO	NO					
EFAD1700	Soil	CONCRETE BARRIER FILLED WITH SCRAP METAL; COMPOSITE SOIL SAMPLE COLLECTED	0	AD17	CONCRETE BARRIER FILLED WITH SCRAP METAL IN DIRT LOT BY AGLAND	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAD18G01	Debris	THIN BELTING MATERIAL; SUSPECT ACM DEBRIS	2-10	AD18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA

**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)					
EFAD1900	Soil	HIGH WEEDS IN SPOTS; COMPOSITE SOIL SAMPLE COLLECTED	0	AD19	NATURAL GRASSES AND WEEDS WITH MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA					
EFAD2000	Soil	DEBRIS PILES; COMPOSITE SOIL SAMPLE COLLECTED	0	AD20	WEEDS WITH INTERMIXED TRASH &DEBRIS PILES	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD21	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES										
EFAD22G01	Debris	WINDOW GLAZING; SUSPECT ACM DEBRIS	2-10	AD22	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES						NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD25	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD26	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AD27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AD30	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AD31	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AD32	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO										
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AD33	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	NO										
EFAD3400	Soil	20 PERCENT OF CELL COVERED BY TELEPHONE POLES, 50 PERCENT ASPHALT; COMPOSITE SOIL SAMPLE COLLECTED	0	AD34	BRICK AND GLASS DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA					
EFAE01G01	Debris	BLACK ROOFING MATERIAL	>25	AE01	DEBRIS PILE AREA	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA					
EFAE01G02	Debris	WHITE LINOLEUM	>25	AE01	DEBRIS PILE AREA	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA					

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE01	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE02	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE03	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE04	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
EFAE0500	Soil	DEBRIS PILE AREA; COMPOSITE SOIL SAMPLE COLLECTED	>25	AE05	GENERAL TRASH AND TWO TIRES; HALF OF CELL IS IN DEBRIS PILE AREA	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAE05G01	Debris	BLACK ROOFING MATERIAL GRAB SAMPLE; DEBRIS PILE AREA	>25	AE05	NATURAL GRASSES AND WEEDS; HALF OF CELL IS IN DEBRIS PILE AREA	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAE0600	Soil	INTERMIXED SPARSE TRASH; COMPOSITE SOIL SAMPLE COLLECTED	0	AE06	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAE0700	Soil	INTERMIXED SPARSE TRASH; BLACK PUMUS ROCKS; COMPOSITE SOIL SAMPLE COLLECTED	0	AE07	NATURAL GRASSES AND WEEDS MIXED WITH INTERMIXED TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAE0800	Soil	PILE OF TRASH ON NW CORNER OF CELL	0	AE08	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAE0900	Soil	2 PIECES OF ROOFING SHINGLES; COMPOSITE SOIL SAMPLE COLLECTED	2	AE09	NATURAL GRASSES AND WEEDS INTERMIXED WITH TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAE1000	Soil	3 PIECES OF SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AE10	NATURAL GRASSES AND WEEDS INTERMIXED TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAE1100	Soil	ROOFING SHINGLE; COMPOSITE SOIL SAMPLE COLLECTED	1	AE11	NATURAL GRASSES AND WEEDS	INSPECTED, ACM REMOVED	NO	NO	NA		ND	NO	NA



TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT LOT PRIMARILY AGLAND PROPERTY	0	AE15	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT LOT PRIMARILY AGLAND PROPERTY	0	AE16	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
EFAE1700	Soil	DEBRIS PILE AREA; COMPOSITE SOIL SAMPLE COLLECTED	>25	AE17	DEBRIS PILES MIXED WITH WEEDS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAE17G01	Debris	DEBRIS PILES THERMAL SURFACING INSULATION (TSI) FROM ESBF	>25	AE17	DEBRIS PILES MIXED WITH WEEDS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	40		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAE19G01	Debris	WHITE PLASTER GRAB SAMPLE COLLECTED; DEBRIS PILE AREA	>25	AE19	DEBRIS PILES WOODEN TELEPHONE POLE SCRAP METAL	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAE1900	Soil	DEBRIS PILE AREA; COMPOSITE SOIL SAMPLE COLLECTED	>25	AE19	DEBRIS PILES WOODEN TELEPHONE POLE	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAE2000	Soil	MIXED TRASH; COMPOSITE SOIL SAMPLE COLLECTED	0	AE20	WEEDS WITH INTERMIXED TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE21	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE25	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE26	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AE27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE IN CELL	>25	AE32	ASPHALT PARKING LOT WITH SMALL TRANSITE ACM DEBRIS	INSPECTED, ACM LEFT	YES	YES					

**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAE33G01	Debris	TRANSITE GRAB SAMPLE COLLECTED	2-10	AE33	MINIMAL BROKEN TRANSITE SHINGLES	INSPECTED, ACM REMOVED	NO	NO	Chrysotile	10		NO	NA
EFAE3400	Soil	WORN OUT CRACKED ASPHALT LOT INTERMIXED WITH METAL DEBRIS AND BRICKS; COMPOSITE SOIL SAMPLE COLLECTED	0	AE34	METAL AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF01	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF02	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF03	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF04	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF05	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
EFAF0600	Soil	NATURAL GRASSES AND WEEDS, SUSPECT ACM (BLACK ROOFING SHINGLES); COMPOSITE SOIL SAMPLE COLLECTED	2-10	AF06	NATURAL GRASSES AND WEEDS	INSPECTED, ACM REMOVED	NO	NO	NA		ND	NO	NA
EFAF0700	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AF07	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAF1000	Soil	BLACK ROOFING TAR SHINGLES; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AF10	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH; HALF AREA IN CONCRETE PIT	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAF1100	Soil	1/4 OF CELL IN THE CONCRETE PIT; COMPOSITE SOIL SAMPLE COLLECTED	0	AF11	NATURAL GRASSES AND WEEDS WITH 1/4 AREA IN CONCRETE PIT	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAF1200	Soil	WHITE PAPER-LIKE FIBROUS MATERIAL; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AF12	NATURAL GRASSES AND WEEDS MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAF1300	Soil	BLACK ROOFING TAR SHINGLES; COMPOSITE SOIL SAMPLE COLLECTED	1	AF13	NATURAL GRASSES AND WEEDS WITH TRASH DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAF1400	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AF14	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAF1500	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AF15	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED WEEDS AND GRASSES WITH WOOD DEBRIS	0	AF16	WOOD DEBRIS	INSPECTED, NO ACM	NO	YES					
EFAF1700	Soil	DEBRIS PILE AREA; COMPOSITE SOIL SAMPLE COLLECTED	>25	AF17	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAF17G01	Debris	WHITE PLASTER	>25	AF17	MIXED DEBRIS AND FILL PILE AREA	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAF17G02	Debris	BLACK ROOFING TAR WITH SILVER PAINT	>25	AF17	DEBRIS DUMP PILE AREA	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAF1900	Soil	NATURAL GRASSES AND WEEDS INTERMIXED WITH DEBRIS PILES; COMPOSITE SOIL SAMPLE COLLECTED	>25	AF19	DEBRIS PILES WITH SUSPECT ACM	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAF19G01	Debris	BLACK FIBOROUS MACHINE BELT	>25	AF19	DEBRIS PILES CONCRETE FOUNDATION OF OLD PUMP HOUSE IN CELL	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAF2000	Soil	BLACK ROOFING TAR; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AF20	WEEDS MINIMAL TRASH DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA



TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAF2100	Soil	BLACK ROOFING TAR SHINGLES; COMPOSITE SOIL SAMPLE COLLECTED	>25	AF21	ROCK DEBRIS PILES SCRAP WOOD WEEDS AND GRASS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF21	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AF27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN TRANSITE SHINGLE ON RAIL SPUR	>25	AF28	MIXED TRASH WITH TRANSITE SHINGLE	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN TRANSITE SHINGLE ON RAIL SPUR	>25	AF29	MIXED TRASH WITH TRANSITE SHINGLE	INSPECTED, ACM LEFT	YES	YES					
EFAF30G01	Debris	CONCRETE AND 50 PERCENT RAILROAD TRENCH; TRANSITE AND SHINGLE PRESENT; GRAB SAMPLE OF TRANSITE COLLECTED	>25	AF30	WOOD AND METAL DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	10		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN TRANSITE SHINGLE ALONG RAIL SPUR	>25	AF31	MIXED TRASH WITH TRANSITE SHINGLE	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SMALL PEA SIZED TRANSITE SHINGLE IN CELL	>25	AF32	OLD ASPHALT PARKING LOT WITH INTERMIXED WEEDS AND GRASSES AND MINIMAL TRASH DEBRIS	INSPECTED, ACM LEFT	YES	YES					
EFAF3300	Soil	WESTERN 20 PERCENT ASPHALT; TRANSITE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	>25	AF33	LARGE DEBRIS PILE NE CORNER	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAF3400	Soil	WORN OUT CRACKED ASPHALT LOT INTERMIXED WITH CONCRETE DEBRIS AND BRICKS; COMPOSITE SOIL SAMPLE COLLECTED	0	AF34	CONCRETE BRICK	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG01	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG02	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG03	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG04	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
EFAG0500	Soil	HALF OF CELL IS IN DEBRIS PILE AREA; COMPOSITE SOIL SAMPLE COLLECTED	>25	AG05	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH; HALF OF CELL IS IN DEBRIS PILE AREA	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAG0600	Soil	FIBOROUS PAPER AND BLACK ROOFING SHINGLES; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AG06	NATURAL GRASSES AND WEEDS WITH INTERMIXED TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAG0700	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AG07	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAG08G01(LABELLED IN FORM 1 EFAG05G01)	Debris	BLACK TAR LAYER UNDERNEATH CONCRETE OF PIT	>25	AG08	ALL OVER PIT	INSPECTED, ACM LEFT	NO	YES	NA	ND		NO	NA
EFAG1300	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AG13	NATURAL GRASSES AND WEEDS 1/2 CELL IN CONCRETE PIT	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAG1400	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AG14	NATURAL GRASSES AND WEEDS MINIMAL TRASH; 1/4 OF CELL IN CONCRETE PIT	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAG1500	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AG15	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	ON RR TRACKS BLACK ROCK DEBRIS	0	AG16	RR TRACKS BLACK ROCK PILES MIXED DEBRIS WEEDS HIGH IN AREAS	INSPECTED, NO ACM	NO	YES					



**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAG1700	Soil	ON RR TRACKS BLACK ROCK DEBRIS; COMPOSITE SOIL SAMPLE COLLECTED	0	AG17	RR TRACKS BLACK ROCK PILES MIXED DEBRIS WEEDS HIGH IN AREAS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAG18G01	Debris	WHITE BLACK SHINGLE; WHITE AGGREGATE	2-10	AG18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAG18G02	Debris	GREEN PLASTER	2-10	AG18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG18	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAG1900	Soil	DEBRIS PILES PARTIALLY ON RR TRACKS. WHITE DRYWALL PLASTER; COMPOSITE SOIL SAMPLE COLLECTED	>25	AG19	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAG2000	Soil	DEBRIS PILES; BLACK ROOFING TAR SHINGLES AND WHITE DRYWALL PLASTER; 20 PERCENT INSIDE FENCE; COMPOSITE SOIL SAMPLE COLLECTED	>25	AG20	RAILROAD TRACK DEBRIS, CONCRETE BRICK WOOD, RAILROAD BALLAST	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAG20G01	Debris	BLACK ROOFING TAR SHINGLES	>25	AG20	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
EFAG20G02	Debris	ROOFING MATERIAL	>25	AG20	DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
EFAG2100	Soil	DEBRIS PILES IN CELL; COMPOSITE SOIL SAMPLE COLLECTED	>25	AG21	STEEL BEAMS WEEDS MIXED DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG21	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAG22G01	Debris	ASPHALT ROOFING MATERIAL	2-10	AG22	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	Chrysotile	5		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AG27	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AG28	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AG29	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AG30	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	INTERMIXED WEEDS AND GRASSES GRAVEL LOT ON GREAT WESTERN SUGARS PROPERTY	0	AG33	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
EFAG34G01	Debris	SHINGLE GRAB SAMPLE COLLECTED	1	AG34	VERY LITTLE DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH01	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH02	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH03	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH04	SUSPECT ACM DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES					
EFAH0500	Soil	HIGH NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AH05	NATURAL GRASSES AND WEEDS; MINIMAL TRASH; PILE OF WOODEN BEAMS SOUTH CORNER	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAH0600	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AH06	NATURAL GRASSES AND WEEDS	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAH0700	Soil	BLACK ROOFING TAR MATERIAL; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AH07	NATURAL GRASSES AND WEEDS; MINIMAL TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAH0800	Soil	BLACK ROOFING SHINGLE; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AH08	NATURAL GRASSES AND WEEDS; MINIMAL TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAH0900	Soil	BLACK ROOFING SHINGLE; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AH09	NATURAL GRASSES AND WEEDS; MINIMAL TRASH	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAH1700	Soil	BLACK ROOFING TAR; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AH17	MIXED FILL DEBRIS NATURAL GRASSES AND WEEDS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAH1800	Soil	NO ACM PRESENT OUTSIDE FENCE, RAILROAD TRACKS PRESENT 30 PERCENT OF SQUARE. DEBRIS PILE INSIDE FENCE; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AH18	INSIDE FENCE SECTION OF CELL HAS DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAH18G01	Debris	FIBERBOARD	2-10	AH18	INSIDE FENCE; DEBRIS PILES	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAH1900	Soil	WOOD AND MISCELLANEOUS DEBRIS; NO ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AH19	WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAH2000	Soil	RAIL CARS PARKED ON TRACKS, 20 PERCENT OF SQUARE; COMPOSITE SOIL SAMPLE COLLECTED	0	AH20	WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAH2100	Soil	RAILROAD TRACKS 20 PERCENT OF SQUARE, NO ACM PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AH21	METAL, WOOD, AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAH22G01	Debris	ASPHALT ROOFING MATERIAL GRAB SAMPLE COLLECTED	10-25	AH22	INSIDE FENCE ; MISC BURNED TOYS AND DERBIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
EFAH23G01	Debris	ASPHALT ROOFING MATERIAL GRAB SAMPLE COLLECTED	2-10	AH23	INSIDE FENCE; METAL DEBRIS, WOOD, BRICKS AND RUBBER BELT MATERIAL.	INSPECTED, ACM LEFT	YES	YES	Chrysotile	TR		NO	NA
EFAH23G01	Debris	GASKET MATERIAL	2-10	AH23	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAH23G02	Debris	GASKET MATERIAL	2-10	AH23	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA



TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH24	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DEBRIS PILES; SUSPECT ACM	>25	AH25	INSIDE FENCE; METAL DEBRIS, WOOD, BRICK	INSPECTED, ACM LEFT	YES	YES					
EFAH27G01	Debris	ASPHALT ROOFING MATERIAL, SHINGLE PRESENT BUT NOT SAMPLED; GRAB SAMPLE OF WALL BOARD	>25	AH27	LARGE DEBRIS PILE NW CORNER; WOOD METAL CONCRETE BRICK	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAH27G02	Debris	CONVEYOR BELT MATERIAL	>25	AH27	LARGE DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AH28	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AH29	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	BROKEN UP CONCRETE LOT	0	AH30	NO SUSPECT ACM	INSPECTED, NO ACM	NO	NO					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HIGH WEEDS SLOPE SIDE; NO SUSPECT ACM	0	AI06	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HIGH WEEDS SLOPE SIDE; NO SUSPECT ACM	0	AI07	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES					
EFAI0800	Soil	HIGH WEEDS SLOPE SIDE; COMPOSITE SOIL SAMPLE COLLECTED	0	AI08	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI0900	Soil	HIGH WEEDS SLOPE SIDE; COMPOSITE SOIL SAMPLE COLLECTED	0	AI09	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI1000	Soil	HIGH WEEDS SLOPE SIDE; COMPOSITE SOIL SAMPLE COLLECTED	0	AI10	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI1100	Soil	CONCRETE DEBRIS SLOPE SIDE; COMPOSITE SOIL SAMPLE COLLECTED	0	AI11	NATURAL GRASSES AND WEEDS MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAI1200	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AI12	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI1300	Soil	NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AI13	NATURAL GRASSES AND WEEDS MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI14G01	Debris	BLACK ROOFING TAR SHINGLES	2-10	AI14	OUTSIDE OF CONCRETE PIT INSPECTED	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
EFAI1700	Soil	BLACK ROOFING SHINGLE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	1	AI17	NATURAL GRASSES AND WEEDS WITH INTERMIXED DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAI1800	Soil	BLACK ROOFING SHINGLE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	10-25	AI18	WOOD DEBRIS AND INTERMIXED DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAI1900	Soil	LARGE DEBRIS PILE 50 PERCENT OF CELL; NO SUSPECT ACM MATERIAL VISUALLY PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI19	WOOD AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI2000	Soil	LARGE DEBRIS PILE 50 PERCENT OF CELL; NO SUSPECT ACM MATERIAL VISUALLY PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI20	WOOD AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI2100	Soil	LARGE DEBRIS PILE IN CELL; NO SUSPECT ACM MATERIAL VISUALLY PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI21	WOOD AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAI2200	Soil	SHINGLE TRANSITE; 50 PERCENT RAILROAD TRACKS; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AI22	WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAI23G01	Debris	RAILROAD TRACKS 70 PERCENT OF SQUARE; SUSPECT BELT MATERIAL SAMPLED, SHINGLE TRANSITE PRESENT AS WELL	>25	AI23	WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAI2400	Soil	SHINGLE TRANSITE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	>25	AI24	WOOD, BRICK, AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAI2500	Soil	SURFACE SOIL MIXED WITH SHINGLE TRANSITE; COMPOSITE SOIL SAMPLE COLLECTED	>25	AI25	INSIDE & OUTSIDE FENCE; WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	Chrysotile		TR	NO	NA
EFAI2600	Soil	SHINGLE TRANSITE, ASPHALT ROOFING MATERIAL; COMPOSITE SOIL SAMPLE COLLECTED	10-25	AI26	INSIDE & OUTSIDE FENCE; WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAI27G01	Debris	SHINGLE TRANSITE	2-10	AI27	INSIDE & OUTSIDE FENCE; WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	8		NO	NA
EFAI27G02	Debris	ASPHALT ROOFING MATERIAL	>25	AI27	WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
EFAI27G03	Debris	WHITE/BLACK ASPHALT SHINGLE	10-25	AI27	INSIDE & OUTSIDE FENCE; WOOD AND METAL DEBRIS WITH SHINGLE TRANSITE PIECES	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAI28G01	Debris	ASPHALT ROOFING MATERIAL PRESENT	2-10	AI28	WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	15		NO	NA
EFAI28G02	Debris	ASPHALT ROOFING SHINGLE	>25	AI28	WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAI28G03	Debris	SHINGLE TRANSITE	>25	AI28	WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	8		NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAI2900	Soil	NW 25 PERCENT OF SQUARE ASPHALT, NO ROOFING MATERIAL PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI29	NO DEBRIS PRESENT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAI3000	Soil	NW CORNER ON CONCRETE, NO ROOFING MATERIAL PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI30	NO DEBRIS PRESENT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAI3100	Soil	NO ROOFING MATERIAL PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AI31	NO DEBRIS PRESENT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAJ1700	Soil	MIXED ROCKS AND DEBRIS; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ17	NATURAL GRASSES AND WEEDS. MIXED ROCKS AND DEBRIS. MINIMAL TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAJ1800	Soil	NO SUSPECT ACM; VERY LITTLE WOOD DEBRIS; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ18	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAJ1900	Soil	50 PERCENT OF SQUARE INACCESSIBLE; LARGE DEBRIS PILE. NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ19	METAL, WOOD, AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	SCRAP METAL AND WOOD DEBRIS; NO SUSPECT ACM	0	AJ20	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES					
EFAJ2100	Soil	LARGE METAL STORAGE BIN. NO VISUAL SUSPECT ACM.; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ21	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAJ22G01	Debris	EVIDENCE OF BURNING THROUGHOUT GRID SQUARE; TRANSITE SHINGLE, ASPHALT ROOFING MATERIAL, BELT MATERIAL; HIGH TEMP GASKET SAMPLED	10-25	AJ22	VERY LITTLE DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA



**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAJ2300	Soil	TRANSITE SHINGLE , ASPHALT ROOFING MATERIAL; EVIDENCE OF BURNING; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ23	METAL, WOOD, AND MISCELLANEUOS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2400	Soil	SHINGLE TRANSITE ASPHALT ROOFING MATERIAL; CONCENTRATED NEAR RAILROAD TRACKS; ALL PEA SIZED	>25	AJ24	METAL, WOOD, AND MISCELLANEUOS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2500	Soil	SHINGLE TRANSITE PRESENT, MANY SMALL PIECES; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ25	METAL, WOOD, AND MISCELLANEUOS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2600	Soil	TRANSITE SHINGLE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ26	WOOD, BRICK, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2700	Soil	20 PERCENT ASPHALT, ASPHALT AND TRANSITE SHINGLE PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ27	METAL, WOOD, AND MISCELLANEUOS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2800	Soil	30 PERCENT OF SQUARE ASPHALT, ROOFING MATERIAL PRESENT (ASPHALT AND TRANSITE); COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ28	METAL, WOOD, AND MISCELLANEUOS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ2900	Soil	ROOFING MATERIAL PRESENT (ASPHALT AND TRANSITE), CONCENTRATED AROUND RAILROAD; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ29	SMALL AMOUNT WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ3000	Soil	ROOFING MATERIAL PRESENT (ASPHALT AND TRANSITE), SCATTERED NEAR RAILROAD; COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ30	WOOD AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA



TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAJ3100	Soil	NO ROOFING MATERIAL PRESENT; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ31	NO DEBRIS PRESENT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAJ3200	Soil	NO ROOFING MATERIAL PRESENT IN THIS CELL; COMPOSITE SOIL SAMPLE COLLECTED	0	AJ32	NO DEBRIS PRESENT	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAJ3300	Soil	ROOFING MATERIAL PRESENT(ASPHALT AND TRANSITE); COMPOSITE SOIL SAMPLE COLLECTED	>25	AJ33	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ3400	Soil	RAILROAD TRACKS 50 PERCENT OF SQUARE , ROOFING MATERIAL PRESENT(ASPHALT AND TRANSITE); COMPOSITE SOIL SAMPLE COLLECTED	10-25	AJ34	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAJ3500	Soil	50 PERCENT ON OTHER PROPERTY, ROOFING MATERIAL PRESENT(ASPHALT AND TRANSITE); COMPOSITE SOIL SAMPLE COLLECTED	2-10	AJ35	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DISTURBED AREA; NO VISUAL SUSPECT ACM.	0	AK17	NATURAL GRASSES AND WEEDS BY LIME PILE; MIXED ROCKS AND DEBRIS. MINIMAL TRASH	INSPECTED, NO ACM	NO	YES					
EFAK18G01	Debris	TAR PAPER GRAB SAMPLE COLLECTED	1	AK18	ONE PIECE OF DEBRIS	INSPECTED, ACM REMOVED	NO	NO	NA	ND		NO	NA
EFAK1900	Soil	DISTURBED AREA; NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK19	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK2000	Soil	NW CORNER OF SQUARE UNSAFE TO SAMPLE; NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK20	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

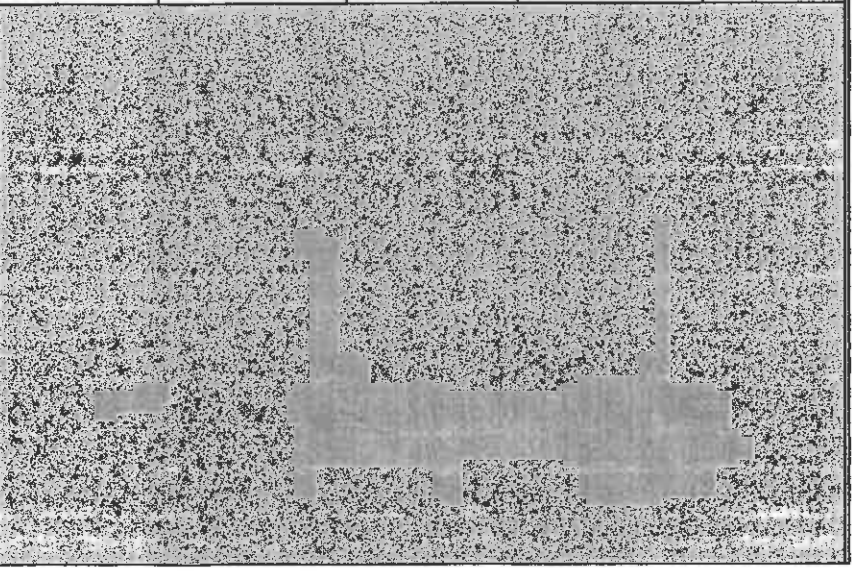
Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAK2100	Soil	HEAVY VEGETATION; NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK21	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK2200	Soil	BELT MATERIAL, TRANSITE SHINGLE; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AK22	MINIMAL DEBRIS REFUSE	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAK2300	Soil	NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK23	METAL AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK2400	Soil	NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK24	VERY LITTLE MISCELLANEOUS DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK2500	Soil	ASPHALT ROOFING MATERIAL; OPEN MANHOLE IN SW CORNER; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AK25	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	NO	NA		ND	NO	NA
EFAK2600	Soil	TRANSITE SHINGLE, CONCENTRATED AROUND WESTERN SIDE; COMPOSITE SOIL SAMPLE COLLECTED	>25	AK26	WOOD DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HEAVY VEGETATION WITH ACCESS ROAD AND PARTIAL RAIL ROAD; NO SUSPECT ACM	0	AK27	WOOD & METAL DEBRIS	INSPECTED, NO ACM	NO	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HEAVY VEGETATION WITH ACCESS ROAD AND RAIL ROAD; NO SUSPECT ACM	0	AK28	WOOD DEBRIS	INSPECTED, NO ACM	NO	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HEAVY VEGETATION WITH ACCESS ROAD AND RAIL ROAD; NO SUSPECT ACM	0	AK29	WOOD DEBRIS	INSPECTED, NO ACM	NO	YES					
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HEAVY VEGETATION WITH ACCESS ROAD AND RAIL ROAD; NO SUSPECT ACM	0	AK30	WOOD & METAL DEBRIS	INSPECTED, NO ACM	NO	YES					

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	HEAVY VEGETATION WITH ACCESS ROAD AND RAIL ROAD; NO SUSPECT ACM	0	AK31	WOOD & METAL DEBRIS	INSPECTED, NO ACM	NO	YES					
EFAK32G01	Debris	BLACK SHINGLE WITH WHITE SPECKS GRAB SAMPLE COLLECTED	>25	AK32	ASPHALT TAR ROOFING MATERIAL STILL PRESENT; RAILROAD TRACKS 30 PERCENT OF CELL. METAL AND WOOD DEBRIS PRESENT.	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT ACCESS ROAD; WOOD AND MISCELLANEOUS DEBRIS; SUSPECT ROOFING MATERIAL PRESENT	>25	AK33	ROOFING MATERIAL, ASPHALT MATERIAL AND METAL DEBRIS	INSPECTED, ACM LEFT	YES	YES					
EFAK34G01	Debris	ASPHALT TAR ROOFING MATERIAL SAMPLE COLLECTED, SUSPECT ACM PRESENT	>25	AK34	ROOFING MATERIAL, ASPHALT MATERIAL AND METAL DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	10		NO	NA
EFAK34G02	Debris	BLACK SHINGLE WITH WHITE SPECKLED COLORING	>25	AK34	ROOFING MATERIAL, ASPHALT MATERIAL AND METAL DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAK3500	Soil	NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK35	FIBERGLASS, WOOD, METAL, AND CONCRETE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK3600	Soil	HEAVY VEGETATION MADE VISUAL INSPECTION DIFFICULT. NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK36	WOOD, CONCRETE, AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK3700	Soil	HEAVY VEGETATION MADE VISUAL INSPECTION DIFFICULT. NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AK37	METAL, CONCRETE DEBRIS, AND ROOFING MATERIAL	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAK3800	Soil	WOODEN AND METAL DEBRIS AND ONE PIECE OF SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	1	AK38	MISCELLANEOUS DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT ACCESS ROAD WITH LIME PILE TO NORTH; NO SUSPECT ACM	0	AL17	NO DERBIS	INSPECTED, NO ACM	NO	NO					
EFAL1800	Soil	NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AL18	MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAL19G01	Debris	BELT MATERIAL PRESENT; GRAB SAMPLE COLLECTED	>25	AL19	METAL, GLASS, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	65		NO	NA
EFAL20G01	Debris	TAN PAINTED SUSPECT ACM GRAB SAMPLE COLLECTED	2-10	AL20	METAL, WOOD, AND CONCRETE DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
EFAL2100	Soil	NO VISUAL SUSPECT ACM; COMPOSITE SOIL SAMPLE COLLECTED	0	AL21	MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAL23G01	Debris	TRANSITE SHINGLE SAMPLE GRAB SAMPLE COLLECTED; TRANSITE REMOVED; ALSO ROLLING DUMPSTER IN CENTER	2-10	AL23	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	YES	YES	Chrysotile	10		NO	NA
EFAL2400	Soil	HEAVY VEGETATION; COMPOSITE SOIL SAMPLE COLLECTED	0	AL24	METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAL2500	Soil	HEAVY VEGETATION; COMPOSITE SOIL SAMPLE COLLECTED	0	AL25	VERY LITTLE GARBAGE	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAL2600	Soil	ASPHALT ROOFING MATERIAL PRESENT, CONCRETE TRENCH IN NE CORNER, HEAVY VEGETATION; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AL26	VERY LITTLE DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAL2700	Soil	HEAVY VEGETATION, COMPOSITE SOIL SAMPLE COLLECTED	0	AL27	WOOD AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAL2800	Soil	HEAVY VEGETATION, COMPOSITE SOIL SAMPLE COLLECTED	0	AL28	WOOD, METAL, AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA



TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAL2900	Soil	HEAVY VEGETATION; SUSPECT ACM CONVEYOR BELT MATERIAL AND ROOFING MATERIAL REMOVED FROM CELL PRIOR TO SOIL SAMPLING; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AL29	WOOD, METAL, CONCRETE, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAL29G01	Debris	ROOFING MATERIAL PRESENT; GRAB SAMPLE OF CONVEYOR BELT COLLECTED	2-10	AL29	WOOD, METAL, CONCRETE, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM REMOVED	NO	YES	Chrysotile	85		NO	NA
EFAL3000	Soil	HEAVY VEGETATION; CONVEYOR BELT PRESENT AND REMOVED FROM CELL; COMPOSITE SOIL SAMPLE COLLECTED	1	AL30	WOOD DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAL31G01	Debris	ASPHALT ROOFING MATERIAL GRAB SAMPLE COLLECTED; ASPHALT ROOFING MATERIAL UNDER WOOD DEBRIS	>25	AL31	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAL32G01	Debris	VERY FRIABLE, WHITE FIBROUS PLASTER MATERIAL ON A ESBF BOILER, GRAB SAMPLE COLLECTED;	>25	AL32	METAL, BRICK, BOILER FACILITY COMPONENT AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	Chrysotile	45		YES	25
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	FACILITY COMPONENT(ESBF BOILER) IN CELL; SUSPECT ACM; WOOD, BRICK, METAL AND, MISCELLANEOUS DEBRIS	>25	AL33	METAL, BRICK, BOILER FACILITY COMPONENT AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES					
EFAL3400	Soil	COMPOSITE SOIL SAMPLE COLLECTED	0	AL34	WOOD DEBRIS	INSPECTED, NO ACM	YES	YES	Chrysotile		TR	NO	NA
EFAL3500	Soil	PEA SIZED SUSPECT ACM NOT REMOVED, ORANGE SIZED SUSPECT ACM REMOVED; COMPOSITE SOIL SAMPLE COLLECTED	>25	AL35	WOOD, CONCRETE, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA



TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/ Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAL3600	Soil	HEAVY VEGETATION MADE VISUAL INSPECTION DIFFICULT, SUSPECT ACM REMOVED; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AL36	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAL3700	Soil	TALL VEGETATION MADE INSPECTION DIFFICULT, SUSPECT ACM REMOVED; COMPOSITE SOIL SAMPLE COLLECTED	2-10	AL37	PAPER, PLASTIC, ASPHALT, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAL37G01	Debris	WHITE FIBROUS PAPER GRAB SAMPLE COLLECTED	2-10	AL37	PAPER, PLASTIC, ASPHALT, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
EFAL3800	Soil	METAL AND WOODEN DEBRIS, SUSPECT ACM PARTIALLY REMOVED AND SAMPLE COLLECTED EFAL38G01	>25	AL38	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	NO	YES	NA		ND	NO	NA
EFAL38G01	Debris	OFF WHITE PLASTER/PAINT	>25	AL38	WOOD, METAL, AND MISCELLANEOUS DEBRIS	INSPECTED, ACM LEFT	NO	YES	NA	ND		NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	DIRT ACCESS ROAD WITH LIME PILE TO NORTH; NO SUSPECT ACM	0	AM17	NO DERBIS	INSPECTED, NO ACM	NO	NO					
EFAM1800	Soil	NATURAL GRASSES AND WEEDS; MINIMAL DEBRIS; COMPOSITE SOIL SAMPLE COLLECTED	0	AM18	MINIMAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM19G01	Debris	THIN BELT MATERIAL GRAB SAMPLE COLLECTED	1	AM19	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	Chrysotile	65		NO	NA
EFAM2000	Soil	VERY HEAVY VEGETATION; ONE PIECE OF THIN BELT MATERIAL REMOVED; COMPOSITE SOIL SAMPLE COLLECTED	1	AM20	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAM21G01	Debris	TRANSITE ROOFING SHINGLE	2-10	AM21	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	Chrysotile	10		NO	NA

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAM21G02	Debris	THIN BELT MATERIAL	2-10	AM21	MINIMAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	Chrysotile	65		NO	NA
EFAM2200	Soil	CONCRETE TRENCH ON EAST SIDE OF CELL; NATURAL GRASSES AND WEEDS; COMPOSITE SOIL SAMPLE COLLECTED	0	AM22	GENERAL DEBRIS, VERY LITTLE TRASH	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2300	Soil	NATURAL GRASSES AND WEEDS	0	AM23	VERY LITTLE GARBAGE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2400	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM24	VERY LITTLE GARBAGE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2500	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM25	VERY LITTLE GARBAGE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2600	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM26	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2700	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM27	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM2800	Soil	HEAVY VEGETATION, SOIL COMPOSITE COLLECTED	0	AM28	VERY LITTLE DEBRIS	INSPECTED, NO ACM	YES	YES	Chrysotile		TR	NO	NA
EFAM2900	Soil	HEAVY VEGETATION, SOIL COMPOSITE COLLECTED	0	AM29	WOOD AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM3000	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM30	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM3100	Soil	HEAVY VEGETATION; SOIL COMPOSITE COLLECTED	0	AM31	METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM3200	Soil	NATURAL GRASSES AND WEEDS; SOIL COMPOSITE SAMPLE COLLECTED	0	AM32	WOOD, METAL, AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
VISUALLY INSPECTED; SAMPLE NOT COLLECTED	NA	WHITE FIBROUS PLASTER FRIABLE; METAL, WOOD, AND BRICK DEBRIS	>25	AM33	METAL, BRICK, AND MISCELLANEOUS SUSPECT ACM DEBRIS	INSPECTED, ACM LEFT	YES	YES					

**TABLE 14, continued**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail**

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EFAM3400	Soil	COMPOSITE SOIL SAMPLE COLLECTED, SUSPECT ACM NOTED.	>25	AM34	BLACK TAR ROOFING MATERIAL, WOOD, AND MSICELLANEOUS DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAM34G01	Debris	TAR ROOFING MATERIAL GRAB SAMPLE COLLECTED	>25	AM34	BLACK TAR ROOFING MATERIAL, WOOD, AND MSICELLANEOUS DEBRIS. FACILITY COMPONENT.	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAM34G02	Debris	WHITE FIBROUS PLASTER INSULATION	>25	AM34	BLACK TAR ROOFING MATERIAL, WOOD, AND MSICELLANEOUS DEBRIS.	INSPECTED, ACM LEFT	YES	YES	Chrysotile	60		NO	NA
EFAM3500	Soil	SOIL COMPOSITE COLLECTED; 1 PIECE OF SUSPECT ACM	1	AM35	METAL, CONCRETE, AND WOOD DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAM35G01	Debris	WHITE FIBROUS PLASTER INSULATION	1	AM35	METAL, CONCRETE, AND WOOD DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA
EFAM3600	Soil	VEGETATION DENSE; SOIL COMPOSITE COLLECTED	0	AM36	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM3700	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AM37	WOOD, METAL, AND PAPER DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAM3800	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AM38	WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN2900	Soil	HEAVY VEGETATION;; ONE PIECE OF TAN PAPER SUSPECT ACM REMOVED PRIOR TO SOIL SAMPLING; COMPOSITE SOIL SAMPLE COLLECTED	1	AN29	CONCRETE AND METAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA		ND	NO	NA
EFAN29G01	Debris	CELL ON 30 PERCENT ON OTHER PROPERTY, HEAVY VEGETATION; TAN PAPER SUSPECT ACM GRAB SAMPLE COLLECTED	1	AN29	CONCRETE AND METAL DEBRIS	INSPECTED, ACM REMOVED	NO	YES	NA	ND		NO	NA

TABLE 14, continued  
 Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAN3000	Soil	HEAVY VEGETATION, SOIL COMPOSITE COLLECTED	0	AN30	CONCRETE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO -	NA
EFAN3100	Soil	HEAVY VEGETATION, SOIL COMPOSITE COLLECTED	0	AN31	VERY LITTLE DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3200	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN32	GLASS, BRICK, AND METAL DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3300	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN33	METAL, WOOD, AND BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3400	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN34	METAL SCREENS, PIPE, AND WOOD DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3500	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN35	BRICK AND PAPER DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3600	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN36	BRICK DEBRIS	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAN3700	Soil	SMALL ACM DEBRIS NOT REMOVED, AND ONE LARGE PIECE REMOVED; COMPOSITE SOIL SAMPLE COLLECTED	>25	AN37	METAL, WOODEN, BRICK, AND CARDBOARD DEBRIS	INSPECTED, ACM LEFT	YES	YES	NA		ND	NO	NA
EFAN3800	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AN38	WOODEN, BRICK, CARDBOARD	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAO0100	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AO01	NATURAL WEEDS & GRASSES ON HILLSIDE OF LIME	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAO0200	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AO02	NATURAL WEEDS & GRASSES ON HILLSIDE BY LIME PILE	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA
EFAO0300	Soil	SOIL SAMPLE COLLECTED, SUSPECT ACM NOTED IN DEBRIS PILE.	>25	AO03	DEBRIS PILE SHINGLES AND DRYWALL	INSPECTED, ACM LEFT	YES	YES	Chrysotile		TR	NO	NA

TABLE 14, continued  
Eaton Sugar Beet Factory Asbestos-Contaminated Soil Analytical Results and Sample Detail

Sample ID	Sample Material Type	Soil Sample Material Description	Suspect Asbestos Containing Material Pieces Present	Sample Location Cell	Sample Cell Description	Sample Cell Inspection Disposition	*Confirmed/Suspect ACM Left	*Confirmed Non-ACM Left	*Asbestos Mineral Type	*Debris Sample Asbestos Estimate (%)	*Soil Sample Asbestos Estimate (%)	*Friable Asbestos Present in Sample Cell	*Friable Asbestos (% of cell)
EFAO03G01	Debris	BLACK ROOFING SHINGLES & TAR	>25	AO03	NATURAL WEEDS & GRASSES WITH DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	Chrysotile	12		NO	NA
EFAO03G02	Debris	WHITE DRYWALL PLASTER	>25	AO03	DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	NA	ND		NO	NA
EFAO0400	Soil	CONCRETE DEBRIS & TRASH; COMPOSITE SOIL SAMPLE COLLECTED	0	AO04	NATURAL WEEDS & GRASSES WITH DEBRIS PILE	INSPECTED, NO ACM	NO	YES	NA		ND	NO	NA
EFAO0500	Soil	SOIL COMPOSITE COLLECTED; FRIABLE ACM NOTED IN DEBRIS PILE	>25	AO05	DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	NA		ND	YES	30
EFAO05G01	Debris	GASKET WITH SPRAY ON	>25	AO05	DEBRIS PILE FROM ESBF	INSPECTED, ACM LEFT	YES	YES	Chrysotile	65		NO	NA
EFAO05G02	Debris	MAGBLOCK INSULATION PILE FRIABLE ACM	>25	AO05	DEBRIS PILE	INSPECTED, ACM LEFT	YES	YES	Amosite	25		YES	30
EFAO0600	Soil	SOIL COMPOSITE COLLECTED; NO VISUAL SUSPECT ACM	0	AO06	NATURAL WEEDS & GRASSES	INSPECTED, NO ACM	NO	NO	NA		ND	NO	NA

Note: An asbestos sample was not collected in some sample cells because uniform debris was encountered in multiple cells in the same area. In this case, the debris in one of the cells was sampled and the surrounding cells were visually inspected to confirm the presence of similar asbestos-containing materials. Sampling and removal of suspect ACM debris occurred prior to composite soil sampling during the visual inspection.

ND = Not Detected

NA = Not Applicable

TR = Trace Detection

\* These attributed fields data were produced once all samples analytical data were received from the laboratory.



**TABLE 15**  
**Analytical Results for Lime Waste Pile Samples**

Sample ID: Lab Sample ID:	Reporting Limit, mg/L	EFLM01 M3039	EFLM02 M3040	EFLM03 M3041	EFLM04 M3042	EFLM05 M3043
<b>RCRA Metals</b>						
Chromium, mg/kg	0.001	12	6.67	15	14	13
Arsenic, mg/kg	0.001	0.689	0.795	1.14	1.02	1.09
Selenium, mg/kg	0.001	0.114	0.376	0.009	0.487	0.65
Silver, mg/kg	0.001	0.217	0.145	0.099	0.032	0.081
Cadmium, mg/kg	0.001	0.284	0.222	0.338	0.384	0.307
Barium, mg/kg	0.001	32.5	29.4	33.9	27.2	34.5
Mercury, mg/kg	0.001	0.26	0.188	0.227	0.12	0.31
Lead, mg/kg	0.001	2.06	1.37	2.41	1.76	2.68
<b>Supplemental Ions</b>						
Calcium, mg/kg	0.001	158600	158900	187700	223500	183800
Magnesium, mg/kg	0.001	2247	3385	1993	1680	1983
Sodium, mg/kg	0.001	545	360	495	831	762
Potassium, mg/kg	0.001	367	247	380	509	1101
Moisture, Wt. %	NA	7.8	11.3	4.45	16.48	17.27
Carbon, Wt. %	NA	12.4	12.28	12.4	11.98	11.41
As Received Weight, g	NA	2398.6	2454.9	2454.1	2189.3	2432.1
Weight used in analysis, g	NA	148.4	230	211	255.7	177.4
Screen Size	NA					
50 Mesh, Wt. %	NA	16.78	10.96	12.56	30.93	15.05
100 Mesh, Wt. %	NA	7.09	9.48	8.01	14.55	10.43
150 Mesh, Wt. %	NA	3.71	4.69	5.21	5.98	5.24
200 Mesh, Wt. %	NA	2.09	4.91	3.18	2.35	2.65
325 Mesh, Wt. %	NA	45.35	59.43	64.64	17.99	14.71
- 325 Mesh, Wt. %	NA	23.79	9.96	7.49	27.14	50.11
Cumulative Weight %						
50 Mesh, Wt. %	NA	16.78	10.96	12.56	30.93	15.05
100 Mesh, Wt. %	NA	23.87	20.44	20.57	45.48	25.48
150 Mesh, Wt. %	NA	27.58	25.13	25.78	51.46	30.72

**TABLE 15, continued**  
**Analytical Results for Lime Waste Pile Samples**

Sample ID: Lab Sample ID:	Reporting Limit, mg/L	EFLM01 M3039	EFLM02 M3040	EFLM03 M3041	EFLM04 M3042	EFLM05 M3043
200 Mesh, Wt. %	NA	29.67	30.04	28.96	53.81	33.37
325 Mesh, Wt. %	NA	75.02	89.47	93.6	71.8	48.08
- 325 Mesh, Wt. %	NA	98.81	99.43	101.09	98.94	98.19
<b>Chemical Analysis, Wt. % - Dry Basis</b>						
Silicon Dioxide	NA	6.94	6.41	9.43	4.54	10.41
Aluminum Oxide	NA	1.01	1.15	1.65	0.77	1.61
Iron Oxide	NA	0.43	0.42	0.65	0.33	0.6
Calcium Oxide	NA	83.14	82.99	80.6	85.3	78.99
Magnesium Oxide	NA	1.88	2.54	1.41	0.92	1.17
Sodium Oxide	NA	1.25	0.25	0.29	0.16	0.38
Potassium Oxide	NA	0.25	0.16	0.32	0.12	0.58
Titanium Dioxide	NA	0.02	0.03	0.04	0.01	0.03
Manganese Dioxide	NA	0.05	0.06	0.06	0.05	0.06
Phosphorus Pentoxide	NA	2.75	2.83	2.37	3.43	3.16
Strontium Oxide	NA	0.06	0.08	0.05	0.05	0.05
Barium Oxide	NA	0.02	0.03	0.02	0.02	0.03
Sulfur Trioxide	NA	1.42	1.12	1.39	2.42	1.18
<b>Hypothetical Calcium Compounds, Wt. % - Dry Basis</b>						
MgCO <sub>2</sub>	NA	2.26	3.03	1.72	1.09	1.42
CaSO <sub>4</sub> *2H <sub>2</sub> O	NA	1.76	1.38	1.74	2.95	1.46
Ca <sub>3</sub> (PO <sub>4</sub> ) <sub>2</sub>	NA	3.46	3.54	3.02	4.24	4
CaCO <sub>3</sub>	NA	83.23	82.03	82.72	83.7	80.31
CaO Ca(OH) <sub>2</sub>	NA	<0.1	<0.1	<0.1	<0.1	<0.1
Unaccounted Lol	NA	5.25	6.12	5.16	6.55	6.76
SiO <sub>2</sub> , Al <sub>2</sub> O <sub>3</sub> , Fe <sub>2</sub> O <sub>3</sub>	NA	4.83	4.55	6.82	3.19	7.31
<b>Total</b>	NA	100.79	100.65	101.18	101.72	101.26

g gram  
 mg/L milligrams per liter  
 mg/kg milligrams per kilogram  
 NA Not applicable

**TABLE 16**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AA31	2,500	40.525630061	-104.708657146
AA30	2,500	40.525767391	-104.708656551
AA29	2,500	40.525904722	-104.708655956
AA28	2,500	40.526042052	-104.708655362
AA19	2,500	40.527415354	-104.708649415
AB34	2,500	40.525217617	-104.708478961
AB33	2,500	40.525354947	-104.708478366
AB32	2,500	40.525492277	-104.708477771
AB31	2,500	40.525629607	-104.708477176
AB30	2,500	40.525766938	-104.708476581
AB29	2,500	40.525904268	-104.708475986
AB28	2,500	40.526041598	-104.708475391
AB24	2,500	40.526590919	-104.708473011
AB23	2,500	40.526728249	-104.708472416
AB22	2,500	40.526865579	-104.708471821
AB18	2,500	40.527002910	-104.708471226
AB21	2,500	40.527140240	-104.708470631
AB20	2,500	40.527277570	-104.708470036
AB19	2,500	40.527414900	-104.708469441
AB01	2,500	40.529749513	-104.708459324
AC34	2,500	40.525217162	-104.708298993
AC33	2,500	40.525354493	-104.708298398
AC32	2,500	40.525491823	-104.708297802
AC31	2,500	40.525629153	-104.708297207
AC30	2,500	40.525766483	-104.708296611
AC29	2,500	40.525903814	-104.708296016
AC28	2,500	40.526041144	-104.708295421
AC27	2,500	40.526178474	-104.708294825
AC26	2,500	40.526315804	-104.708294230
AC25	2,500	40.526453135	-104.708293634

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AC24	2,500	40.526590465	-104.708293039
AC23	2,500	40.526727795	-104.708292444
AC22	2,500	40.526865125	-104.708291848
AC18	2,500	40.527002455	-104.708291253
AC20	2,500	40.527277116	-104.708290062
AC19	2,500	40.527414446	-104.708289467
AC17	2,500	40.527551776	-104.708288871
AC05	2,500	40.529199738	-104.708281726
AC04	2,500	40.529337068	-104.708281130
AC03	2,500	40.529474399	-104.708280535
AC02	2,500	40.529611729	-104.708279939
AC01	2,500	40.529749059	-104.708279344
AD34	2,500	40.525216708	-104.708119025
AD33	2,500	40.525354038	-104.708118429
AD32	2,500	40.525491368	-104.708117833
AD31	2,500	40.525628699	-104.708117237
AD30	2,500	40.525766029	-104.708116642
AD27	2,500	40.526178020	-104.708114854
AD26	2,500	40.526315350	-104.708114259
AD25	2,500	40.526452680	-104.708113663
AD22	2,500	40.526864671	-104.708111876
AD18	2,500	40.527002001	-104.708111280
AD21	2,500	40.527139331	-104.708110684
AD20	2,500	40.527276661	-104.708110088
AD19	2,500	40.527413991	-104.708109492
AD17	2,500	40.527551322	-104.708108897
AD16	2,500	40.527688652	-104.708108301
AD08	2,500	40.528787293	-104.708103534
AD07	2,500	40.528924623	-104.708102938
AD06	2,500	40.529061954	-104.708102342
AD05	2,500	40.529199284	-104.708101747

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AD04	2,500	40.529336614	-104.708101151
AD03	2,500	40.529473944	-104.708100555
AD02	2,500	40.529611274	-104.708099959
AD01	2,500	40.529748604	-104.708099363
AE34	2,500	40.525216253	-104.707939056
AE33	2,500	40.525353583	-104.707938460
AE32	2,500	40.525490914	-104.707937864
AE27	2,500	40.526177565	-104.707934883
AE26	2,500	40.526314895	-104.707934287
AE25	2,500	40.526452225	-104.707933691
AE18	2,500	40.527001546	-104.707931307
AE21	2,500	40.527138876	-104.707930710
AE20	2,500	40.527276207	-104.707930114
AE19	2,500	40.527413537	-104.707929518
AE17	2,500	40.527550867	-104.707928922
AE16	2,500	40.527688197	-104.707928326
AE15	2,500	40.527825527	-104.707927730
AE11	2,500	40.528374848	-104.707925345
AE10	2,500	40.528512178	-104.707924749
AE09	2,500	40.528649508	-104.707924152
AE08	2,500	40.528786838	-104.707923556
AE07	2,500	40.528924169	-104.707922960
AE06	2,500	40.529061499	-104.707922364
AE05	2,500	40.529198829	-104.707921768
AE04	2,500	40.529336159	-104.707921171
AE03	2,500	40.529473489	-104.707920575
AE02	2,500	40.529610819	-104.707919979
AE01	2,500	40.529748149	-104.707919383
AF34	2,500	40.525215798	-104.707759088
AF33	2,500	40.525353128	-104.707758491
AF32	2,500	40.525490459	-104.707757895



**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AF31	2,500	40.525627789	-104.707757298
AF30	2,500	40.525765119	-104.707756702
AF29	2,500	40.525902449	-104.707756105
AF28	2,500	40.526039780	-104.707755509
AF27	2,500	40.526177110	-104.707754913
AF18	2,500	40.527001091	-104.707751333
AF21	2,500	40.527138421	-104.707750737
AF20	2,500	40.527275751	-104.707750140
AF19	2,500	40.527413082	-104.707749544
AF17	2,500	40.527550412	-104.707748947
AF16	2,500	40.527687742	-104.707748351
AF15	2,500	40.527825072	-104.707747754
AF14	2,500	40.527962402	-104.707747158
AF13	2,500	40.528099733	-104.707746561
AF12	2,500	40.528237063	-104.707745965
AF11	2,500	40.528374393	-104.707745368
AF10	2,500	40.528511723	-104.707744771
AF07	2,500	40.528923714	-104.707742982
AF06	2,500	40.529061044	-104.707742385
AF05	2,500	40.529198374	-104.707741789
AF04	2,500	40.529335704	-104.707741192
AF03	2,500	40.529473034	-104.707740595
AF02	2,500	40.529610364	-104.707739999
AF01	2,500	40.529747694	-104.707739402
AG34	2,500	40.525215343	-104.707579120
AG33	2,500	40.525352673	-104.707578523
AG30	2,500	40.525764664	-104.707576732
AG29	2,500	40.525901994	-104.707576135
AG28	2,500	40.526039324	-104.707575538
AG27	2,500	40.526176655	-104.707574942
AG22	2,500	40.526863306	-104.707571957

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AG18	2,500	40.527000636	-104.707571360
AG21	2,500	40.527137966	-104.707570763
AG20	2,500	40.527275296	-104.707570167
AG19	2,500	40.527412626	-104.707569570
AG17	2,500	40.527549957	-104.707568973
AG16	2,500	40.527687287	-104.707568376
AG15	2,500	40.527824617	-104.707567779
AG14	2,500	40.527961947	-104.707567182
AG13	2,500	40.528099277	-104.707566585
AG08	2,500	40.528785928	-104.707563600
AG07	2,500	40.528923258	-104.707563004
AG06	2,500	40.529060588	-104.707562407
AG05	2,500	40.529197918	-104.707561810
AG04	2,500	40.529335249	-104.707561213
AG03	2,500	40.529472579	-104.707560616
AG02	2,500	40.529609909	-104.707560019
AG01	2,500	40.529747239	-104.707559422
AH30	2,500	40.525764208	-104.707396762
AH29	2,500	40.525901539	-104.707396165
AH28	2,500	40.526038869	-104.707395568
AH27	2,500	40.526176199	-104.707394971
AH25	2,500	40.526450859	-104.707393776
AH24	2,500	40.526588190	-104.707393179
AH23	2,500	40.526725520	-104.707392582
AH22	2,500	40.526862850	-104.707391984
AH18	2,500	40.527000180	-104.707391387
AH21	2,500	40.527137510	-104.707390790
AH20	2,500	40.527274841	-104.707390193
AH19	2,500	40.527412171	-104.707389595
AH17	2,500	40.527549501	-104.707388998
AH09	2,500	40.528648142	-104.707384220

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AH08	2,500	40.528785472	-104.707383623
AH07	2,500	40.528922803	-104.707383025
AH06	2,500	40.529060133	-104.707382428
AH05	2,500	40.529197463	-104.707381831
AH04	2,500	40.529334793	-104.707381233
AH03	2,500	40.529472123	-104.707380636
AH02	2,500	40.529609453	-104.707380039
AH01	2,500	40.529746783	-104.707379441
AI31	2,500	40.525626422	-104.707217390
AI30	2,500	40.525763752	-104.707216793
AI29	2,500	40.525901083	-104.707216195
AI28	2,500	40.526038413	-104.707215597
AI27	2,500	40.526175743	-104.707215000
AI26	2,500	40.526313073	-104.707214402
AI25	2,500	40.526450403	-104.707213805
AI24	2,500	40.526587734	-104.707213207
AI23	2,500	40.526725064	-104.707212609
AI22	2,500	40.526862394	-104.707212012
AI18	2,500	40.526999724	-104.707211414
AI21	2,500	40.527137054	-104.707210816
AI20	2,500	40.527274385	-104.707210219
AI19	2,500	40.527411715	-104.707209621
AI17	2,500	40.527549045	-104.707209024
AI14	2,500	40.527961036	-104.707207231
AI13	2,500	40.528098366	-104.707206633
AI12	2,500	40.528235696	-104.707206035
AI11	2,500	40.528373026	-104.707205438
AI10	2,500	40.528510356	-104.707204840
AI09	2,500	40.528647686	-104.707204242
AI08	2,500	40.528785016	-104.707203645
AI07	2,500	40.528922347	-104.707203047

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AI06	2,500	40.529059677	-104.707202449
AJ35	2,500	40.525076645	-104.707039812
AJ34	2,500	40.525213975	-104.707039215
AJ33	2,500	40.525351306	-104.707038617
AJ32	2,500	40.525488636	-104.707038019
AJ31	2,500	40.525625966	-104.707037421
AJ30	2,500	40.525763296	-104.707036823
AJ29	2,500	40.525900626	-104.707036225
AJ28	2,500	40.526037957	-104.707035627
AJ27	2,500	40.526175287	-104.707035029
AJ26	2,500	40.526312617	-104.707034431
AJ25	2,500	40.526449947	-104.707033833
AJ24	2,500	40.526587278	-104.707033235
AJ23	2,500	40.526724608	-104.707032637
AJ22	2,500	40.526861938	-104.707032039
AJ18	2,500	40.526999268	-104.707031441
AJ21	2,500	40.527136598	-104.707030843
AJ20	2,500	40.527273928	-104.707030245
AJ19	2,500	40.527411259	-104.707029647
AJ17	2,500	40.527548589	-104.707029049
AK38	2,500	40.524664198	-104.706861639
AK37	2,500	40.524801528	-104.706861041
AK36	2,500	40.524938858	-104.706860443
AK35	2,500	40.525076189	-104.706859844
AK34	2,500	40.525213519	-104.706859246
AK33	2,500	40.525350849	-104.706858648
AK32	2,500	40.525488179	-104.706858050
AK31	2,500	40.525625510	-104.706857451
AK30	2,500	40.525762840	-104.706856853
AK29	2,500	40.525900170	-104.706856255
AK28	2,500	40.526037500	-104.706855656

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AK27	2,500	40.526174830	-104.706855058
AK26	2,500	40.526312161	-104.706854460
AK25	2,500	40.526449491	-104.706853861
AK24	2,500	40.526586821	-104.706853263
AK23	2,500	40.526724151	-104.706852665
AK22	2,500	40.526861481	-104.706852066
AK18	2,500	40.526998812	-104.706851468
AK21	2,500	40.527136142	-104.706850870
AK20	2,500	40.527273472	-104.706850271
AK19	2,500	40.527410802	-104.706849673
AK17	2,500	40.527548132	-104.706849074
AL38	2,500	40.524663741	-104.706681672
AL37	2,500	40.524801072	-104.706681074
AL36	2,500	40.524938402	-104.706680475
AL35	2,500	40.525075732	-104.706679877
AL34	2,500	40.525213062	-104.706679278
AL33	2,500	40.525350392	-104.706678679
AL32	2,500	40.525487723	-104.706678080
AL31	2,500	40.525625053	-104.706677482
AL30	2,500	40.525762383	-104.706676883
AL29	2,500	40.525899713	-104.706676284
AL28	2,500	40.526037044	-104.706675686
AL27	2,500	40.526174374	-104.706675087
AL26	2,500	40.526311704	-104.706674488
AL25	2,500	40.526449034	-104.706673890
AL24	2,500	40.526586364	-104.706673291
AL23	2,500	40.526723695	-104.706672692
AL18	2,500	40.526998355	-104.706671495
AL21	2,500	40.527135685	-104.706670896
AL20	2,500	40.527273015	-104.706670297
AL19	2,500	40.527410345	-104.706669699



**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AL17	2,500	40.527547676	-104.706669100
AM38	2,500	40.524663284	-104.706501706
AM37	2,500	40.524800615	-104.706501107
AM36	2,500	40.524937945	-104.706500508
AM35	2,500	40.525075275	-104.706499909
AM34	2,500	40.525212605	-104.706499310
AM33	2,500	40.525349936	-104.706498710
AM32	2,500	40.525487266	-104.706498111
AM31	2,500	40.525624596	-104.706497512
AM30	2,500	40.525761926	-104.706496913
AM29	2,500	40.525899256	-104.706496314
AM28	2,500	40.526036587	-104.706495715
AM27	2,500	40.526173917	-104.706495116
AM26	2,500	40.526311247	-104.706494517
AM25	2,500	40.526448577	-104.706493918
AM24	2,500	40.526585907	-104.706493319
AM23	2,500	40.526723238	-104.706492720
AM22	2,500	40.526860568	-104.706492121
AM18	2,500	40.526997898	-104.706491522
AM21	2,500	40.527135228	-104.706490923
AM20	2,500	40.527272558	-104.706490323
AM19	2,500	40.527409888	-104.706489724
AM17	2,500	40.527547219	-104.706489125
AN38	2,500	40.524662827	-104.706321739
AN37	2,500	40.524800157	-104.706321139
AN36	2,500	40.524937488	-104.706320540
AN35	2,500	40.525074818	-104.706319941
AN34	2,500	40.525212148	-104.706319341
AN33	2,500	40.525349478	-104.706318742
AN32	2,500	40.525486808	-104.706318142
AN31	2,500	40.525624139	-104.706317543

**TABLE 16, cont.**  
**Eaton Sugar Beet Factory Asbestos-Contaminated Soil Visual Inspection Cells' Geographic Coordinates**

Visual Inspection Cell Number	Cell Area (Square Feet)	Latitude	Longitude
AN30	2,500	40.525761469	-104.706316944
AN29	2,500	40.525898799	-104.706316344
AC21	2,500	40.527139786	-104.708290657
AO04	2,500	40.527586284	-104.705598346
AO05	2,500	40.527585829	-104.705419613
AO02	2,500	40.527587194	-104.705955811
AO03	2,500	40.527586739	-104.705777079
AO01	2,500	40.527587643	-104.706132391
AO06	2,500	40.527585366	-104.705238204

Note: Latitude/Longitude coordinates were collected in projected coordinate system Universal Transverse Mercator Zone 13 North North American Datum 1983.



